



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

April 9, 2021

Delivered electronically to "benton@pacifier.com"

Subject: PDC Case 87767

Dear Don Benton:

Enclosed is a copy of an electronic letter sent to Myst Beal, Nancy Bocek, and Lawrence Goldman concerning complaints filed with the Public Disclosure Commission (PDC).

As noted in the letter to Myst Beal, Nancy Bocek, and Lawrence Goldman, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

As noted in the letter to the complainants, the alleged violations of failing to include sponsor identification on your grass roots lobbying mailings have been dismissed because your mailings did not constitute "political advertising"<sup>1</sup> and therefore did not require sponsor identification. Your mailings qualified as a grass roots lobbying campaign under RCW 42.17A.640, which allows 30 days to report expenditures and associated contributions. Thank you for filing the L-6 Grass Roots Lobbying on April 1, 2021, in advance of its due date, and in full compliance with the law.

If you have questions, you may contact Phil Stutzman at 360-664-8853 toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically Signed Philip E. Stutzman*

Phil Stutzman  
Compliance Officer

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<sup>1</sup> RCW 42.17A.005(40) defines political advertising as any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations, digital communication, or other means of mass communication, used for the purpose of appealing, directly or indirectly, for votes or for financial or other support or opposition in any election campaign.

Endorsed by,

*Electronically Signed Barbara Sandahl*

Barbara Sandahl  
Deputy Director  
For Peter Frey Lavalley  
Executive Director

Enclosure: Letter to Complainants Myst Beal, Nancy Bocek, and Lawrence Goldman