



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

September 10, 2019

Delivered electronically to "bookkeeping@omb.org"

Subject: Complaint filed by Andrew Saturn, PDC Case 33672

Dear Affordable Housing Council of Olympia Master Builders:

Below is a copy of an electronic letter sent to Andrew Saturn concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Andrew Saturn, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of the timely disclosure of all independent expenditure and electioneering communication activities; as well as the requirement for complete and accurate sponsor identification on political advertising and electioneering communications, and the timely filings of all future PDC reports in accordance with the statutes and rules.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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September 10, 2019

Delivered electronically to "saturn@gmail.com"

Subject: Complaint regarding Affordable Housing Council of Olympia Master Builders, PDC Case 33672

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 4, 2018. The complaint alleged that Affordable Housing Council of Olympia Master Builders (Respondent), a political committee, may have violated RCW 42.17A.255, .260 and .305 for failure to disclose independent expenditures and electioneering communications; and RCW 42.17A.320 for failure to disclose sponsor identification on political advertising.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; and the applicable PDC report filed by Respondent, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- Pursuant to RCW 42.17A.260 and 305 the Respondent was required to report electioneering communications within 24 hours of appearing to the public.
- As previously stated in findings of case 27466 dated February 28, 2018 the Respondent filed the C-6 on November 16, 2017 and will not be addressed in this case.
- Pursuant to RCW 42.17A.320 and WAC 390-18-010 the Respondent was required to include top 5 contributors who had given \$1,000 or more as part of the required sponsor identification on political advertising and electioneering communications.
- At the time of the advertising the Olympia Master Builders had contributed \$10,991.39 to the Respondent and should have been disclosed as a top contributor on the political advertising and electioneering communication.
- The non-compliance is mitigated by the fact that the Respondent timely reported the monetary and in-kind contributions from the Olympia Master Builders, Olympia Master Builders is in the name of the Respondent and the public was not deprived of critical information in a time sensitive period prior to an election.

Based on our findings staff has determined that, in this instance, failure to identify top contributors in sponsor identification, does not amount to a violation warranting further investigation.

PDC staff is reminding Affordable Housing Council of Olympia Master Builders about the importance of the timely disclosure of all independent expenditure and electioneering

communication activities; as well as the requirement for complete and accurate sponsor identification on political advertising and electioneering communications, and the timely filings of all future PDC reports in accordance with the statutes and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Affordable Housing Council of Olympia Master Builders