



**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

August 22, 2019

Delivered electronically to "voteeyes@pascocitizensforbetterschools.com"

Subject: Complaint filed by Roger Lenk, PDC Case 32914

Dear Pasco Citizens for Better Schools:

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

As noted in the letter to Roger Lenk, 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 complete and accurate disclosure of all expenditure details, including the number of items printed for mailed political advertising. PDC staff expects in the future that you will file complete and accurate reports in accordance with statute and rule.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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August 22, 2019

Delivered electronically to "lenk.roger@gmail.com"

Subject: Complaint regarding Pasco Citizens for Better Schools (5), PDC Case 32914

Dear Roger Lenk:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on January 27, 2018. The complaint alleged that Pasco Citizens for Better Schools (Respondent), a political committee, may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign; RCW 42.17A.255 for failure to timely file Independent Expenditures and Electioneering Communications reports (C-6 reports); and RCW 42.17A.240 for failure to accurately and completely disclose details of expenditures undertaken by the Campaign, including the number of items printed for mailed political advertising.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- The Respondent timely filed the C-4 report due 21-days prior to the February 13, 2018, Special Election, but filed the C-4 report due 7-days prior to that election on February 7, 2018, one day beyond the statutory deadline of RCW 42.17A.235.
- RCW 42.17A.255 requires the reporting of any expenditures made in support or opposition to an election campaign, not otherwise required to be reported on C-3 and C-4 reports, pursuant to the timelines provided in that section.
- As the Respondent was a political committee filing C-3 and C-4 reports for their activity, they were not required to file a C-6 report in accordance with RCW 42.17A.255.
- The Respondent reported expenditures to Esprit Printing for printing costs for a mailer in support of a levy replacement proposition for Pasco Schools, presented to the public within 21 days of the February 7, 2018, Special Election, totaling \$4,249.83, and failed to include the number of items printed for mailed political advertising, as required by RCW 42.17A.240 and WAC 390-16-037.

Based on our findings staff has determined that, in this instance, failure to provide accurate and complete descriptions of expenditure details, including the number of items printed for mailed political advertising, does not amount to a violation that warrants further investigation.

PDC staff is reminding Pasco Citizens for Better Schools about the importance of the complete and accurate disclosure of all expenditure details, including the number of items printed for mailed political advertising. PDC staff expects in the future that Pasco Citizens for Better Schools will file complete and accurate reports in accordance with statute and rule.

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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Pasco Citizens for Better Schools