

## State of Washington PUBLIC DISCLOSURE COMMISSION

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January 21, 2022

Delivered electronically to "info@nwpconsulting.com"

Subject: PDC Case 100473

Dear Northwest Passage Consulting, LLC / Christian Sinderman:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Glen Morgan, 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.

However, pursuant to WAC 390-37-060(1)(d), this letter serves as a warning letter concerning the failure of Northwest Passage Consulting (NWP) to properly report activities totaling \$7,000 supporting six charter amendments on the November 2, 2021 general election ballot in San Juan County. NWP was not required to file a C-6 report of Independent Expenditure Ads costing \$1,000 or more, appearing within 21 days of an election, because the advertising was sponsored by nine contributors who were responsible for filing the C-6 report, and who were also responsible for registering and reporting as a political committee, and for being listed as the sponsor on the advertising. The formal written warning will include staff's expectation that all future required reports of contributions and expenditures be properly and timely reported and that the correct sponsor be identified on political advertising. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Phil Stutzman at 360-664-8853 toll-free at 1-877-601-2828, or by e-mail pdc@pdc.wa.gov.

Sincerely,
Electronically Signed Philip E. Stutzman
Phil Stutzman
Compliance Officer
Endorsed by,
Electronically Signed Peter Frey Lavallee
Peter Frey Lavallee
Executive Director