

Northwest Passage Consulting, LLC
105 S Main St Ste 332
Seattle, WA 98104

November 16, 2021

Public Disclosure Commission
pdc@pdc.wa.gov

Re: Alleged Violation of RCW 42.17A.205, and RCW 42.17A.235 & .240

To Whom It May Concern:

Northwest Passage Consulting (NWP) produced and distributed a direct mail piece supporting certain charter amendments in San Juan County. This was a one-time expense and, after reviewing the PDC's Independent Expenditure Ads & Electioneering Communications guide—which does not indicate we needed to register as a political committee—and speaking with the PDC on the phone on 10/22/21, we filed the required Form C6 at the time it was due. During our call with the PDC, we explained the goal of the expense and asked how to report it correctly. Filing the Form C6 is what was recommended, which we did. On section 4, we selected our source of funding as Option D: *A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others*. Since options "e)" and "f)" specifically relate to reporting as a political committee as we are a business we thought this was the correct selection for us to make and that there were no additional filings required.

On 11/15/2021 we attempted to amend the Form C6 to list each individual donor and received the following message:

11/15/21, 4:23 PM

Sources Not Required

Welcome [accounting@nwpcconsulting.com!](#)
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Building Confidence in the Political Process

Public Disclosure Commission

Sources are not required for reports of type Independent Expenditure Ad for sponsors of type BUSINESS WITH OTHERS

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TOLL FREE - 1-877-601-2828 / PHONE 360-753-1111 / FAX (360)753-1112 / EMAIL [pdc@pdc.wa.gov](#)
OFFICE HOURS: 8:00AM - 5:00PM Monday - Friday Closed Weekends & State Holidays.



We have taken every effort to act with full transparency to voters. Importantly, the goal of the disclosure laws was met here. The mailer itself discloses the top five “donors” despite four of the five individuals not reaching the \$1,000 threshold required for the disclaimer. Anyone who received it would have reasonable clarity on the sources of funding and production.

Please let us know if you require additional information. Thank you for the opportunity to respond.

Sincerely,

Christian Sinderman

Owner