



**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.pdcc.wa.gov

January 30, 2024

Delivered electronically to Glenn Dobbs at "info@glenndobbs.com"

Subject: Complaints filed by Xaxira Velasco Ponce de Leon & Spencer Ercanbrack, PDC Case 144377

Dear Glenn Dobbs:

Below is a copy of an electronic letter sent to Xaxira Velasco Ponce de Leon & Spencer Ercanbrack concerning two complaints filed with the Public Disclosure Commission (PDC).

As noted in the letter to Xaxira Velasco Ponce de Leon & Spencer Ercanbrack, 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.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to the Complainants. Staff expects you to timely report Independent Expenditures for political advertising and include required sponsor identification on political advertising. The Commission will consider this 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director



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January 30, 2024

Delivered electronically to Xaxira Velasco Ponce de Leon & Spencer Ercanbrack, at
“xaxiravpdl@outlook.com” & “spenbrack@gmail.com”

Subject: Complaints regarding Glenn Dobbs (Wenatchee Values Alliance), PDC Case 144377

Dear Xaxira Velasco Ponce de Leon & Spencer Ercanbrack:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 23, 2023, and November 6, 2023. The complaints alleged that Glenn Dobbs (Wenatchee Values Alliance) may have violated: (1) RCW 42.17A.255 for failure to include detailed descriptions for an Independent Expenditure (IE) mailing; and (2) RCW 42.17A.320 for failure to include the required sponsor identification on political advertisement, both done in support of Tricia Cleek and Randy Smith, 2023 candidates for Wenatchee School District 246 School Director

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

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

- RCW 42.17A.255 requires that a person who makes an independent expenditure in support of or in opposition to any candidate or ballot proposition files a report with the commission within five days after the date of making an independent expenditure.
- RCW 42.17A.320 requires that all written political advertising, whether related to candidates or ballot propositions, include the sponsor’s name and address.
- The October 23, 2023, complaint included a color flyer from “Wenatchee Values Alliance” endorsing 2023 candidates Tricia Cleek and Randy Smith, and alleged that the flyer failed to clearly include who actually sponsored the advertisement and that the entity “Wenatchee Values Alliance” was not listed as an in-kind donor to either candidate nor had it filed any campaign reports disclosing advertising expenditures.
- The November 6, 2023, complaint included links to online articles showing, among other things, a copy of a newspaper-style advertisement from “The Wenatchee Record” and alleged that it was political advertisement but had failed to include sponsor identification.
- In response to the complaints, Glenn Dobbs first confirmed that he was responsible for the Wenatchee Values Alliance and The Wenatchee Record advertisements and that he had use personal funds for both. Upon confirmation that Mr. Dobbs was responsible for the expenditures, PDC Staff added his name as the Respondent for PDC Case #144377.

- To help mitigate his delinquent filing, Mr. Dobbs submitted Independent Expenditure reports (C-6 reports) on November 2, and 9, 2023, disclosing the cost, attribution to each candidate and detailed information regarding vendors used. The C-6 reports submitted on November 2, 2023, showed two expenditures totaling \$2,279 attributed to Cleek and Smith. The C-6 reports identified expenditures made to Wenatchee World Publishing for printing and postage. The C-6 reports were amended on November 9, 2023, to correct the vendor information and to provide a more detailed description of the expenditures.
- Two original C-6 reports were submitted on November 9, 2023, disclosing \$244 attributed to Cleek and Smith for the color flyer created, printed and mailed by the Respondent using personal funds and resources.
- Staff found that both political advertisements were disclosed late but found no evidence that the Respondent collaborated, coordinated or otherwise communicated with the Cleek or Smith campaigns that would require the activity to be reported as in-kind contributions to the candidates.
- The signs and flyers bought and distributed by Mr. Dobbs lacked the necessary sponsor identification information required by statute. In addition, the Respondent spent over one hundred dollars in the aggregate to produce and distribute the political advertising materials, and he was therefore required to include sponsor identification.

While our investigation found that Mr. Dobbs was the sponsor of two political advertisements and failed to timely file C-6 reports and include sponsor identification information, he was inexperienced and unfamiliar with the PDC requirements pertaining to independent expenditures and sponsor identification requirements on political advertisement. Additionally, our investigation also found no prior PDC violations against Mr. Dobbs.

Based on our findings staff has determined that, in this instance, failure to include sponsor identification for Independent Expenditure advertisements and failure to timely file C-6 reports disclosing those IEs supporting the 2023 Tricia Cleek and Randy Smith campaigns, does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Glenn Dobbs will receive a formal written warning concerning failure to timely report Independent Expenditures for political advertising, including his failure to include sponsor identification requirements on political advertising supporting two 2023 candidates. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director

cc: Glenn Dobbs (Wenatchee Values Alliance)