



**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

February 28, 2018

Delivered electronically to "kris@goforgreene.com"

Subject: PDC Case 25674

Dear Kris Greene:

Enclosed is a copy of a letter sent to Heather Sinnott concerning a complaint filed with the Public Disclosure Commission (PDC) on October 4, 2017. may have violated RCW 42.17A.320 and WAC 390-18-010 for failure to include adequate Sponsor ID on the first page of political advertising. A copy of the complaint was previously sent to you.

As noted in the letter to Heather Sinnott, the PDC 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)(b), this letter serves as a warning letter concerning your failure to disclose adequate Sponsor ID on the first page of mailed written political advertising. PDC Staff expects you to file timely and complete F-1 reports in future years in accordance with PDC laws and rules. 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fox.blackhorn@pdcc.wa.gov.

Sincerely,

Fox Blackhorn
Compliance Coordinator

Endorsed by

Peter Lavallee
Executive Director

Enclosure: Letter to Heather Sinnott



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February 28, 2018

Delivered electronically to "hrsinnott@gmail.com"

Subject: Complaint regarding Kris Greene, PDC Case 25974

Dear Heather Sinnott:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on October 4, 2017. Your complaint alleged that Kris Greene may have violated RCW 42.17A.320 and WAC 390-18-010 for failure to include adequate sponsor ID on the first page of political advertising.

PDC staff reviewed your allegations, and as a result of staff's initial review, we found the following:

- Kris Green mailed written political advertising, designed to look like a magazine, to voters in Clark County during the 2017 election, which failed to include adequate Sponsor ID, "*on the first page or fold of the written advertisement or communication in at least ten-point type.*" RCW 42.17A.320(3)(a).
- In his response, Kris Greene indicated that the pages were not numbered, and the mail is delivered with the recipient's name up. The advertising was designed to open from left to right, with a front-page photo of Kris Greene and his family. The Sponsor ID was displayed on the back, along with endorsements and advertisements.
- Kris Greene is a first-time candidate, with a well-financed and staffed campaign, significant contribution and expenditure activity, and appeared to have understood the requirement to display Sponsor ID on the first page of the written advertisement.
- Proper Sponsor ID was displayed, albeit in the wrong place, mitigating the impact to the public. Kris Greene has no prior found violations of PDC laws and rules.

Based on these initial findings, staff has determined that in this instance, failure to include Sponsor ID on the first page of mailed political advertising, does not amount to a material violation warranting further investigation.

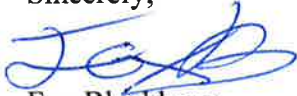
Pursuant to WAC 390-37-060(1)(b), Kris Greene will receive a formal written warning concerning his failure to disclose adequate Sponsor ID on the first page of mailed written political advertising. The formal written warning will include staff's expectation that Kris Greene shall ensure any future political advertising complies with all disclosure requirements.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

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 fox.blackhorn@pdc.wa.gov.

Sincerely,



Fox Blackhorn
Compliance Coordinator

Endorsed by,



Peter Lavalley
Executive Director

cc: Kris Greene