

**Dan Brady**  
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September 28, 2018

***VIA EMAIL ONLY***

Fox Blackhorn  
Washington State Public Disclosure Commission  
P.O. Box 40908  
Olympia, WA 98504-0908

RE: PDC Case No. 40599, Mainstream Republicans of WA State PAC

Dear Mr. Blackhorn:

This correspondence is in response to the complaint filed September 13, 2018 against the Mainstream Republicans of WA State PAC (the PAC) alleging violations of RCW 42.17A. My firm is serving as counsel to the PAC.

RCW 43.17A.320(1) Party Identification

The complaint alleges that party preference was not disclosed for two of three candidates that are the subjects of the mailer referenced in the complaint, specifically Bill Hirt and Patty Kuderer. The mailer in question does in fact disclose that Bill Hirt filed as an independent candidate on both sides of the mailer which satisfies the statute regarding party preference disclosure. The PAC acknowledges the oversight of not disclosing Ms. Kuderer's party preference but notes that the vast majority of the content of the mailer is focused on Rodney Tom whose party preference was properly disclosed.

RCW 42.17A.260(1) Filing Independent Expenditure Reports

The PAC regrets that its compliance team did not receive the information that this mailer was produced until relatively recently. Upon receipt of this complaint from the PDC on Friday, September 14, 2018, the PAC gathered information and filed C-6 reports numbered 8614 and 8615 on Wednesday, September 19, 2018. These reports fully disclose the production and distribution of this mail piece. Please note that these reports were amended on September 27, 2018 to account for an accidental duplicate report (8613) that was subsequently removed, and that those reports are numbered 8624 and 8625, respectively.

Thank you for bringing this matter to our attention, and please contact me with any questions.

Sincerely,

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Dan Brady, WSBA #33731

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**  
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**  
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

**1. Name and complete postal mailing address of sponsor:**

**MAINSTREAM REPUBLICANS OF WA**  
**PO BOX 7531**  
**OLYMPIA, WA 98501**

E-mail

**KCURTIS98903@GMAIL.**

Telephone

**5099497650**

**2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.**

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
07/15/18	07/31/18	MAJORITY STRATEGIES 12854 KENAN DRIVE JACKSONVILLE, FL 32258	CREATED 9,231, PRINTED, MAILED	7,061.72

Expenditures \$100 or less not itemized above \$ 0.00

**Amount or Value**

\*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total this report \$ 7,061.72

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.  
 \$ 144,115.25

**3. List of candidate(s) or ballot proposition(s) identified in the advertising.**

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
HIRT, WILLIAM	STATE SENATOR/LEG DISTRICT 48 - SENATE	INDEPEND	<input type="checkbox"/> <input checked="" type="checkbox"/>	\$ 706.18	\$ 0.00
KUDERER, PATRICIA	STATE SENATOR/LEG DISTRICT 48 - SENATE	DEMOCRAT	<input type="checkbox"/> <input checked="" type="checkbox"/>	\$ 706.17	\$ 0.00
TOM, RODNEY	STATE SENATOR/LEG DISTRICT 48 - SENATE	DEMOCRAT	<input checked="" type="checkbox"/> <input type="checkbox"/>	\$ 5,649.37	\$ 0.00
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

Continued on attached sheet ☐

**Filer Name:****4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
- b) ☐ An individual using personal funds and/or funds received from others.
- c) ☐ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ☐ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ☐ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ☐ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

**5. Sources giving in excess of \$250 for the electioneering communication:**

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		<b>TOTAL FUNDS RECEIVED</b>	<b>\$ 0.00</b>

Sponsor of Independent Expenditure or Electioneering Communication		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature	Printed Name
	Street address	
	City/State/Zip	
	Date Signed	Place Signed (city and county)
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Reporting Form for: (check one)

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☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**  
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**1. Name and complete postal mailing address of sponsor:**

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PO BOX 7531  
OLYMPIA, WA 98501

E-mail

KCURTIS98903@GMAIL.

Telephone

5099497650

**2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.**

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
08/01/18	08/02/18	MAJORITY STRATEGIES 12854 KENAN DRIVE JACKSONVILLE, FL 32258	CREATED 7,296, PRINTED, MAILED	8,499.84

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value <small>*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.</small>	Total this report	\$ 8,499.84
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 152,615.09

**3. List of candidate(s) or ballot proposition(s) identified in the advertising.**

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
HIRT, WILLIAM	STATE SENATOR/LEG DISTRICT 48 - SENATE	INDEPEND	<input type="checkbox"/> <input checked="" type="checkbox"/>	\$ 849.98	\$ 0.00
KUDERER, PATRICIA	STATE SENATOR/LEG DISTRICT 48 - SENATE	DEMOCRAT	<input type="checkbox"/> <input checked="" type="checkbox"/>	\$ 849.99	\$ 0.00
TOM, RODNEY	STATE SENATOR/LEG DISTRICT 48 - SENATE	DEMOCRAT	<input checked="" type="checkbox"/> <input type="checkbox"/>	\$ 6,799.87	\$ 0.00
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

**Filer Name:****4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
- b) ☐ An individual using personal funds and/or funds received from others.
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- g) ☐ Other

**If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.**

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			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		<b>TOTAL FUNDS RECEIVED</b>	<b>\$ 0.00</b>

**Sponsor of Independent Expenditure or Electioneering Communication**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.

Signature

Printed Name

Street address

City/State/Zip

Date Signed

Place Signed (city and county)

\*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."