



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

February 7, 2018

Delivered electronically to “rrose@ilwu47.org”

Subject: PDC Case 23945

Dear Friends of the Port:

Below is a copy of an electronic letter sent to Jim Lazar concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Jim Lazar, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

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,

/s _____
Fox Blackhorn
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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February 7, 2018

Delivered electronically to "jim@jimlazar.com"

Subject: Complaint regarding Friends of the Port, PDC Case 23945

Dear James Lazar:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on August 11, 2017. Your complaint alleged that Friends of the Port may have violated RCW 42.17A.320 for failure to list group using general treasury funds for independent expenditures and RCW 42.17A.435 for improper identification of source of expenditure.

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

- The mailer produced by Friends of the Port for the 2015 election cycle does not appear to constitute political advertising, defined by RCW 42.17A.005(36), as advertising used for the purpose of appealing for votes or financial support or opposition in an election campaign.
- The requirements for Sponsor ID set forth by RCW 42.17A.320 only apply to political advertising.
- As the mailer produced by the Friends of the Port did not mention a candidate for office, there was no reporting requirement for a C-6, and as such no violation of RCW 42.17A.435 can be found.

Based on these initial findings, staff has determined that in this instance, no evidence supports a finding of a material violation warranting further investigation.

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,

/s_____
Fox Blackhorn
Compliance Coordinator

Endorsed by,

/s_____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Friends of the Port