



**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 "millera6@msn.com"

Subject: PDC Case 27921

Dear Matthew Miller:

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

As noted below to Sara Holahan, 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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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

February 7, 2018

Delivered electronically to “saraforanacortes@gmail.com”

Subject: Complaint regarding Matthew Miller, PDC Case 27921

Dear Sara Holahan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on November 21, 2017. Your complaint alleged that Matthew Miller may have violated RCW 42.17A.235 for failure to keep records of expenditures or in-kind contributions for yard signs, and WAC 390-16-125 for exceeding mini-reporting limits without PDC authorization.

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

- On April 27, 2017, Matthew Miller registered as a candidate for the 2017 Election Cycle, under the Mini Reporting option, which per WAC 390-16-105, requires a candidate to raise and spend no more than \$5,000 in the aggregate and receive no more than \$500 from any single contributor except himself. By selecting this option, Matthew Miller was not required to file reports of contributions or expenditures, however he was required by WAC 390-16-105(5) to keep sufficient books of account which members of the public may inspect in the 8 days prior to an election.
- The books of account presented during your inspection provided sufficient information to determine the source of their contributions and the nature of their expenditures; however, did not include records of an expenditure for 48" x 36" aluminum signs with his name on them.
- Matthew Miller denies having paid for, or coordinated with others to pay for and prepare, the 48" x 36" aluminum signs, and insufficient evidence has been presented to determine whether he did. If he did, insufficient evidence has been presented to determine that the

cost of these signs would exceed the \$831.01 necessary to break the Mini Reporting threshold of \$5,000 in violation of WAC 390-16-125.

Based on these initial findings, staff has determined that in this instance, insufficient 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 Lavallee
Executive Director

cc: Matthew C. Miller