



**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

May 17, 2018

Delivered electronically to “degooyer@fanwa.org”

Subject: PDC Case 29882

Dear Faith Action Network:

Enclosed is a copy of a letter sent to Maxford Nelson concerning a complaint filed with the Public Disclosure Commission (PDC) on January 4, 2018. The complaint alleged that you may have violated RCW 42.17A.255 for failure to timely report independent expenditures/electioneering communications. A copy of the complaint was previously sent to you.

As noted in the letter to Maxford Nelson, 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 timely disclose independent expenditures with express advocacy in support of ballot propositions during the 2017 election cycle. PDC staff expects you to file timely and complete 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 Maxford Nelson



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May 17, 2018

Delivered electronically to "MNelsen@FreedomFoundation.com"

Subject: Complaint regarding Faith Action Network, PDC Case 29882

Dear Maxford Nelson:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on January 4, 2018. Your complaint alleged that Faith Action Network may have violated RCW 42.17A.255 for failure to timely report independent expenditures/ electioneering communications.

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

- Faith Action Network wrote and published articles expressly advocating in support of ballot propositions during the 2017 election cycle, valued at over \$100, triggering a C-6 reporting requirement under RCW 42.17A.255.
- Faith Action Network failed to timely and completely report their independent expenditures made in 2017 until February 2018, in violation of RCW 42.17A.255.
- Faith Action Network has no prior violations of PDC laws or rules and the expenditures were small in proportion and impact to the public.

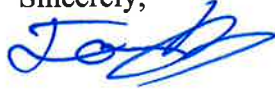
Based on these initial findings, staff has determined that in this instance, failure to timely file the C-6 within 5 days after making an independent expenditure does not amount to a material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Faith Action Network will receive a formal written warning concerning their failure to timely disclose independent expenditures with express advocacy in support of ballot propositions during the 2017 election cycle. The formal written warning will include staff's expectation that Faith Action Network will file timely and complete reports in future years in accordance with PDC laws and rules. 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.

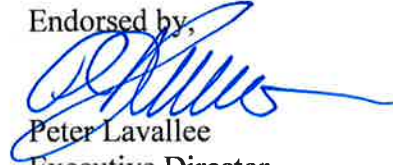
If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fox.blackhorn@pdc.wa.gov.

Sincerely,



Fox Blackhorn
Compliance Coordinator

Endorsed by,



Peter Lavalley
Executive Director

cc: Faith Action Network