



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

August 30, 2018

Delivered electronically to “hello@seattleindivisible.com”

Subject: PDC Case 39237

Dear Indivisible Seattle:

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

As noted below to Dennis Olson, 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 pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

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



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August 30, 2018

Delivered electronically to "olson1de@aol.com"

Subject: Complaint regarding Seattle Indivisible, PDC Case 39237

Dear Dennis Olson:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on 8/7/18. Your complaint alleged that See Attachment may have violated Chapter 42.17A RCW for failure to register and report as a political committee, and failure to report independent expenditures or electioneering communications.

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

- Seattle Indivisible, as noted on its website, was founded in January of 2017, with the purpose of "influencing our Members of Congress via the grassroots to help enact progressive change at the Federal level."
- Seattle Indivisible maintains an internal member list, and is frequently communicating with its members on a regular basis about a variety of issues, mostly concerning federal issues directed at Congress and the President, and includes sending out "calls to action" communications to its members to contact Congress, the President or his administration. These internal member communications include state issue such as requests to contact Governor Inslee and tell him to remove the head of the Department of Licensing, and "internal political communications" to members and volunteers urging their support for Initiative 1631, a statewide initiative in 2018.
- The definition of lobbying is found in RCW 42.17A.005(33), but exempts from lobbying "an association's or other organization's act of communicating with the members of that association or organization" about the passage or defeat of any legislation as defined in RCW 42.17A.
- While Seattle Indivisible did make calls and communications to its members to take action in support of Initiative 1631, those internal political communications are not considered to be contributions under RCW 42.17A.005(16)(b)(v). In addition, internal political

communications from an organization to its members are also exempted from reporting as either an electioneering communication(s) (RCW 42.17A.005(22)), or an independent expenditure(s) (RCW 42.17A.005(30)(b) and RCW 42.17A.255(1)).

Based on these initial findings, staff has determined that in this instance, no evidence supports a finding of an actual 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 fdc@fdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

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

cc: Seattle Indivisible