



## 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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

December 19, 2018

Delivered electronically to Joseph Waldron, Chairman/Treasurer of Gun Owners Action League of WA at "goalwa@cox.net"

Subject: PDC Case 41350

Dear Joseph Waldron:

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

As noted below to Michael Maddux, 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 apparent misuse of the alternative reporting method of fund-raising activities (low-cost fund-raiser) allowed under RCW 42.17A.230. PDC staff expects that you will file C-3 reports disclosing all monetary contributions received and deposited by Gun Owners Action League of WA (GOAL), and that you itemize these individual donations when required by law, in future calendar years. The Commission will consider the 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

Peter Lavalley  
Executive Director



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December 19, 2018

Delivered electronically to Michael Maddux at "michaeljmaddux@gmail.com"

Subject: Complaint regarding Gun Owners Action League of WA, PDC Case 41350

Dear Michael Maddux:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 26, 2018. Your complaint alleged that Gun Owners Action League of WA (GOAL) may have violated RCW 42.17A.230, .235, .240, and .250, for failure to accurately disclose contributions, and failure to report as an out-of-state political committee.

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

- Gun Owners Action League of WA (GOAL) has been registered as an in-state political action committee since June 2001. Joseph Waldron has served as Chairman and Treasurer of GOAL after being elected in 2004.
- The complaint alleged violations of RCW 42.17A.240 by failing to accurately disclose monetary contributions on C-3 reports and for misuse of the alternative reporting method of fund-raising activities (low-cost fund-raiser) allowed under RCW 42.17A.230.
- In his response, Mr. Waldron described the details of the low-cost fund-raisers conducted by GOAL throughout each calendar year, stating that proceeds come from a voluntary two dollar per person increase to the admission price of events sponsored by Washington Arms Collectors.
- This is not a proper low-cost fund-raiser under Washington law.
- The complaint also alleged that (1) the treasurer, Joseph Waldron, had donated to the committee using a Washington state address while actually residing in the State of Florida, (2) that the Florida address was being used as the official address on C-3 reports filed by the recipients of contributions from GOAL, and (3) that GOAL failed to report as an out-of-state committee as required by RCW 42.17A.250.

- In his response, Mr. Waldron, stated that the contributor named Joseph Waldron with a Washington state address is his son and that his address is listed correctly. In addition, Mr. Waldron stated that the Florida address being reported by contribution recipients was caused by a printing mistake on the committee's checks. Per staff's request, Mr. Waldron has followed up with the four 2018 legislative candidates who reported GOAL's address incorrectly based on this printing error, so C-3 reports can be amended.

Based on these facts, staff has determined that in this instance, failure to accurately itemize or disclose individual monetary contributions on C-3 reports as required by law by instead, reporting contributions as low-cost fund-raiser proceeds, does not amount to an actual material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Gun Owners Action League of WA will receive a formal written warning concerning GOAL's misuse of the alternative reporting method of fund-raising activities (low-cost fund-raiser) allowed under RCW 42.17A.230. PDC staff expects that GOAL will file C-3 reports disclosing all monetary contributions received and deposited by the committee, and that the committee itemize these individual donations when required by law, in future calendar years. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff reviewed the remaining allegations concerning (1) the printing error that resulted in the incorrect address for the committee, (2) the address used for donations attributed to Joseph Waldron, and (3) GOAL's failure to report as an out-of-state committee. Staff found no evidence to support those allegations beyond the admitted error made by the committee when printing their address on checks used for distributing campaign contributions. PDC staff has dismissed those allegations in accordance with RCW 42.17A.755(1).

Based on this information, PDC staff has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

For Peter Lavalley  
Executive Director

cc: Gun Owners Action League of WA