

Public Disclosure Commission
711 Capital Way South, #206
Olympia, WA 98504

To Whom It May Concern:

This is a formal Public Disclosure Commission complaint, filed due to violations of Chapter 42.17A of the Revised Code of Washington. Gun Owners Action League of Washington is accused of violating the following statutes:

RCW 42.17A.230

RCW 42.17A.240

RCW 42.17A.250

The committee is registered as, and files reports as if it is, an in-state political committee, but it appears to operate from 2152 Stennis Dr., Pensacola, Florida 32506, the home of Joseph P. Waldron, its chair and treasurer, and not from within Washington state. It appears that the committee has been based in Florida for a number of years, and yet has failed to update registration to disclose its actual address and home state, and has failed to file any of the specific donor disclosures required for out-of-state committees.

The committee also improperly reported, under RCW 42.17A.230, contributions between January 12, 2014 and August 12, 2018. Not only does this improper reporting appear to violate the statute, it also applies to nearly all the contributions reported during the period.

Additionally, the committee has been incorrectly reporting the address of Mr. Waldron when he makes contributions to the committee since at least 2016.

While perhaps not a violation, it further seems unlikely that any committee, no matter its purpose or size, would be able to consistently raise upwards of \$20,000 per year while also, over a period of nearly five years, receiving an exceedingly small number of contributions which above the levels required for more complete disclosure, as the Gun Owners Action League of Washington wants Washingtonians and the Public Disclosure Commission to believe it did; that is, the committee raised more than \$150,000, and yet reported almost no individuals exceeding \$25 in aggregate contributions (under RCW 42.17A.240) nor exceeding \$50 in aggregate contributions (under RCW 42.17A.230). Other similarly funded committees report significantly more donors exceeding aggregate contribution levels requiring further disclosure; see and compare, for example, the 2016 reports filed by Gun Owners Action League of Washington and 2016 reporting filed by: Friends of Washington State University; AWSP – Washington State Principals Legislative Effectiveness Association; Spokane Firefighters Union PAC; Washington Electric Cooperative PAC; Big I Pac; or Professional & Technical Employees, Local 17 PAC. There is no compelling reason to believe that Gun Owners Action League of Washington has a funding structure significantly different from other similar committees, nor that their contribution amounts and levels are in actuality significantly different from those received and reported by other similarly sized committees. Regardless of if there is an obvious violation of RCW 42.17A.230 or RCW 42.17A.240 related to aggregate contribution levels and disclosure of contributor information in the filings of the Gun Owners Action League of Washington, the variance between their filings and the filings of similarly sized committees is concerning and seems to warrant further investigation by the Public Disclosure Commission.

Violations and Evidence

The following Form C3 filings from between June 30, 2016 and October 16, 2017 by candidates supported by the committee list the committee's address as 2152 Stennis Dr., Pensacola, Florida 32506.

100706933, 100727444, 100727973, 100731393, 100734284, 100707112, 100705294, 100706342, 100708763, 100709137, 100709266, 100710298, 100707624, 100707672, 100709349, 100706735, 100706479, 100714016, 100706601, 100712149, 100707127, 100726853, 100730183, 100710106, 100707196, 100805328, 100708414, 100724816, 100705865, 100777121, 100794442, 100795569

The following Form C3 filings by the committee list expenditures made in Pensacola, Florida for office materials, supplies, and other incidental expenses, made between July 7, 2014 and June 21, 2018:

100621307, 100621310, 100738777, 100738780, 100844941

In at least one Form C6 disclosing an electioneering communication, the committee even lists the address of the sponsor of the communication (that is, the address of the committee itself) as 2152 Stennis Dr., Pensacola, Florida 32506. That report, filed on October 16, 2017, is:

C6-7929

There may also be additional filings which (correctly, it appears) list the committee's business address as 2152 Stennis Dr., Pensacola, Florida 32506. There committee does not, however, appear to have ever filed a Form C5 as required for out-of-state committees.

The following Form C3 filings from between January 12, 2014 and August 12, 2018 list \$149,730 of contributions (99.6% of the total contributions reported during the period) as "Proceeds from Low Cost Fundraiser," which appears to fail to meet the standards given in RCW 42.17A.230(2) for the alternative reporting method provided by that section, and certainly fails to meet the descriptive requirements of RCW 42.17A.230(4)(b):

100624935, 100624934, 100576933, 100628091, 100617128, 100698988, 100658668, 100636676, 100634365, 100676085, 100644979, 100687238, 100666636, 100663107, 100679336, 100688281, 100692383, 100715168, 100735240, 100736562, 100738776, 100757824, 100731859, 100742384, 100742383, 100765841, 100753501, 100761612, 100565488, 100568060, 100568581, 100587430, 100609779, 100613931, 100614487, 100630842, 100647342, 100651055, 100668835, 100672171, 100827232, 100676165, 100678960, 100691779, 100672174, 100828553, 100831593, 100840605, 100847636, 100852283, 100573689, 100615757, 100703007, 100696385, 100668293, 100565489, 100575869, 100602438, 100589831, 100571968, 100631831, 100595488, 100628387, 100749390, 100805479, 100782188, 100788747, 100797347, 100810872, 100810871, 100810871, 100799071, 100812281, 100818794, 100800838, 100802177, 100822316, 100722918, 100726765, 100735607, 100747124

There may be additional reports from prior to January 12, 2014 which contain similar violations of RCW 42.17A.230.

Since at least January 15, 2015, the committee has, on Form C1pc filings (see report 100624519, for example) consistently listed Mr. Waldron's address 2152 Stennis Dr., Pensacola, Florida 32506. However, the following reports filed after that date disclose contributions from Mr. Waldron and list his address as 15914 61st Ave. SE, Snohomish, WA 98296:

100691609, 100762072

Thank you for your consideration in this important matter,

Michael Maddux