



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

December 28, 2018

Delivered electronically to “[josh@sutherlandforwa.com](mailto:josh@sutherlandforwa.com)”

Subject: PDC Case 41627

Dear Matthew Sutherland:

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

As noted below to Glen Morgan, 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 failure to accurately and timely report contributions and expenditures, and failure to provide sufficient breakdowns of expenditure details. 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director, for  
Peter Lavalley  
Executive Director



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

December 28, 2018

Delivered electronically to “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaint regarding Matthew Sutherland, PDC Case 41627

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on October 3, 2018. Your complaint alleged that Matthew Sutherland may have violated RCW 42.17A.235, .240, .445 for failure to timely and accurately file expenditure reports and unauthorized use of campaign funds.

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

- Matthew Sutherland failed to timely file reports of contributions and expenditures, including the post-election C-4 for both the Primary and the General Election, as required by RCW 42.17A.235.
- Matthew Sutherland failed to accurately and completely provide detailed breakdowns of expenditures, such as number of items printed for political advertising, and has amended their descriptions to provide the required detail of RCW 42.17A.240 and WAC 390-16-037.
- Expenditures made for "Newspaper Subscription" to the Seattle Times and Lewiston Tribune were made for the purpose of monitoring local news coverage for strategic decision-making, located behind paywall subscriptions, and were allowable uses of campaign funds related to the election campaign.
- Matthew Sutherland is a first-time candidate with no prior found violations of PDC laws or rules.

Based on these initial findings, staff has determined that in this instance, failure to accurately, completely, and timely report contributions and expenditures does not an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Matthew Sutherland will receive a formal written warning concerning failure to accurately and timely report contributions and expenditures, and failure to provide sufficient breakdowns of expenditure details. The Commission will consider the formal

written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), 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](mailto:fdc@fdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director, for  
Peter Lavalley  
Executive Director

cc: Matthew Sutherland