



**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

February 20, 2019

Delivered electronically to "larrison6@comcast.net"

Subject: PDC Case 46357

Dear Matthew Larson:

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

As noted below to Peggy Shepard, 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 Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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



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February 20, 2019

Delivered electronically to "peggyshepard@comcast.net"

Subject: Complaint regarding Matthew Larson, PDC Case 46357

Dear Peggy Shepard:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on January 29, 2019. Your complaint alleged that Matthew Larson may have violated RCW 42.17A.575 by appearing in public service announcements (PSAs) during election year 2017.

PDC staff reviewed your allegations and, as a result, found the following:

- The Respondent was a mayoral candidate for the City of Snoqualmie in 2017.
- The Respondent appears in over a dozen videos produced by the City of Snoqualmie between 2013 and 2018 regarding a variety of city business topics, including economic development, building projects, "state of city" addresses and taped council meetings. The production of such videos is normal and regular conduct for the City of Snoqualmie and its mayor.
- The videos produced by the City of Snoqualmie in which the Respondent appears are informational in nature and no attempt was made to influence voters.
- WA State law defines the term "public service announcement" to include communications that meet all of the following criteria:
 - a) are designed to benefit or promote community health, welfare or safety or nonprofit community events;
 - b) do not sell a product or service;
 - c) are sponsored by an organization with a history of routinely providing such outreach messages to its service area;
 - d) are of primary interest to the general public and do not target voters;
 - e) are not coordinated with, controlled by, or paid for by the candidate's committee or a political committee;
 - f) are subject to the PSA policies of the broadcaster; and
 - g) include arrangements for the candidate's appearance that were made at least six months before the candidate became a candidate.

- The videos in which the Respondent appears do not meet all of the aforementioned criteria and are therefore not PSAs. As a result, the Respondent is not prohibited from appearing in such videos pursuant to RCW 42.17A.575.

Based on these findings, staff has determined that, in this instance, appearing in informational videos regarding city business does not amount to an actual violation warranting further investigation.

The PDC has dismissed 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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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

cc: Matthew Larson