



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.pdca.wa.gov

March 15, 2019

Sent electronically to Marci Busby

Subject: Marci Busby Complaint Return Letter, PDC Case 17884

Ms. Busby:

Below is a copy of a letter sent electronically to Jill Looper concerning the complaint she filed with the Public Disclosure Commission (PDC) against you. As noted below in the letter sent to Ms. Looper, the PDC will not be conducting a more formal investigation into the allegations or taking enforcement action in this matter.

Pursuant to WAC 390-37-060(1)(b), PDC staff is hereby formally warning you concerning the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities as required by PDC laws and rules. This formal written warning conveys staff's expectation that you will fully comply with the C-3 and C-4 reporting requirements in the future should you declare your candidacy for public office, as required for a candidate under the Full Reporting Option. The Commission will consider this formal written warning if there are any future PDC law or rule violations by you.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
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 • Website: www.pdc.wa.gov

March 15, 2019

Sent electronically to Jill Looper

Subject: Marci Busby Complaint, PDC Case 17884

Ms. Looper:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on May 3, 2017, against Marci Busby, an incumbent Snoqualmie Valley School Director and a candidate for re-election to that office in 2017. The complaint alleged that Ms. Busby may have violated RCW 42.17A.235, and .240 by failing to timely file Monetary Contribution reports (C-3 report) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), as required for a candidate under the Full Reporting Option in 2013 and 2017, disclosing contribution and expenditure activities undertaken by her Campaigns.

PDC staff reviewed the allegation listed in the complaint you filed, the statutes, rules and reporting requirements, the C-1, C-3 and C-4 reports filed by the Marci Busby Campaign (Campaign), and the response to the complaint. Based on staff's review, we found the following:

- Ms. Busby was an incumbent Snoqualmie Valley School Director since being elected to that office in 2005. She was re-elected to that office in 2009 under the Mini Reporting Option.
- On July 18, 2013, Ms. Busby filed a Candidate Registration (C-1 report) declaring her candidacy for re-election as School Director, selecting the Full Reporting Option and listing herself as the Campaign Treasurer and only officer. No C-3 or C-4 reports were filed by Ms. Busby during the 2013 Campaign.
- On June 28, 2017, Ms. Busby submitted an email to PDC and attached two documents concerning her 2013 Campaign disclosing she received and spent a total of \$725 that included a \$615 in-kind contribution from Caroline Loudenback, a local real estate broker, for campaign signs. In addition, the Campaign received two anonymous contributions totaling \$110 that were spent for the campaign website and to replace signs that had been damaged/taken. She also attached a copy of the invoice from Ms. Loudenback for the signs.
- On May 2, 2017, Ms. Busby filed a C-1 report declaring her candidacy for re-election as School Director, selecting the Full Reporting Option and listing herself as the Campaign Treasurer and only officer.

- On October 31, 2017, Ms. Busby paper filed one C-3 report disclosing a \$100 contribution from an individual and one C-4 report disclosing a total of \$973 in contribution and expenditure activities that included the \$100 monetary contribution and \$873 for three in-kind contributions received from Caroline Loudenback. The three in-kind contributions from Ms. Loudenback included were for the Campaign domain name (\$49 on 5/18), the Campaign website (\$84 on 6/22), and Campaign yard signs (\$740 on 9/27).
- On December 14, 2017, Ms. Busby filed a final C-4 report disclosing a \$100 expenditure to Ms. Loudenback for Facebook ads.
- Ms. Busby was defeated in the 2017 general election. Ms. Busby timely filed the required F-1 reports as an incumbent School Director from 2006 through 2017.

Based on these findings and the facts that: (1) Marci Busby filed the missing 2017 reports prior to the November 6, 2017 general election; (2) she is no longer in office; and (3) her 2013 and 2017 Campaigns disclosed receiving and spending less than \$1,700 in combined contribution and expenditure activities for both elections, PDC staff has determined that, in this instance, Marci Busby's failure to timely file C-3 and C-4 reports as a candidate for School Director in 2013 and 2017 does not warrant further investigation.

Pursuant to WAC 390-37-060(1)(b), PDC staff issued a formal written warning to Marci Busby concerning the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by a candidate as required by PDC laws and rules. This formal written warning conveys staff's expectation that Marci Busby will timely file C-3 and C-4 reports in the future, should she again become a candidate. The Commission will consider this formal written warning if there are any future PDC law or rule violations by Marci Busby.

Based on this information, the PDC finds has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
Peter Lavalley, Executive Director

cc: Marci Busby

