



STATE OF WASHINGTON  
**PUBLIC DISCLOSURE COMMISSION**

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October 14, 2015

[crabcharlie@gmail.com](mailto:crabcharlie@gmail.com)

CHARLIE CRABTREE  
329 W HEMMI RD  
BELLINGHAM WA 98226

Subject: PDC Complaint 15-72, RE Sources for Sustainable Communities

Dear Mr. Crabtree:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on September 2, 2015. Your complaint alleged that RE Sources for Sustainable Communities may have violated RCW 42.17A.205, .235 and .240 by failing to register and report as a Political Action Committee (PAC).

PDC staff reviewed your allegations, and contacted RE Sources to determine whether a formal investigation or enforcement action is warranted. Staff also reviewed contribution and expenditure reports filed on September 15, 2015 by "RE Sources for Sustainable Communities 2015 Charter Committee" (the Committee). As a result of staff's initial review, we found the following:

- RE Sources is a 501(c)(3) organization with a focus on environmental sustainability that has been active in the Bellingham area since 1982. RE Sources initially lobbied the local legislative authority to put a charter amendment measure on the 2013 general election ballot, activity which is not disclosable to the PDC if the sponsoring entity does not have the expectation of receiving contributions to support or oppose the ballot proposition, and making expenditures to support or oppose the proposition are not one of the entity's primary purposes.
- As the Committee's filings show, once the Whatcom County Council acted to place Proposition 9 on the November 3, 2015 ballot, RE Sources began conducting themselves as a political committee by soliciting contributions and making expenditures to support a ballot proposition.
- After being notified of your complaint, RE Sources registered a PAC under the Full Reporting option on September 10, 2015. In the Committee's preliminary response to the complaint, they stated that they misunderstood the requirement to register a political committee, because of their earlier, unreportable activity to lobby a local government agency. They stated that on learning of the requirement, they retained professional compliance personnel to ensure timely future reporting.



- The Committee's Cash Receipts Monetary Contributions Reports (C-3) and Summary, Full Report Receipts and Expenditures (C-4) filed on September 15, 2015 show contributions of \$51,939 and expenditures of \$51,213 during the period of July 6, 2015 through August 31, 2015.
- 80% of the late-reported activity consisted of in-kind contributions to the Committee from RE Sources, the sponsoring organization, including staff services and overhead expenses. Approximately 50% of the late-reported activity consisted of \$24,000 in public opinion research contributed by RE Sources.
- The in-kind contributions were disclosed as much as 64 days late, but seven weeks before the election.
- Neither RE Sources nor the Committee has any previous violations of PDC laws and rules.

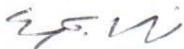
Based on these initial findings, and in particular given that the late-reported activity was disclosed well before the election and consisted largely of in-kind contributions from RE Sources to its political committee, I have determined that RE Sources' failure to register and report the activity of the Committee in a timely manner does not amount to a material violation warranting further action under these circumstances. RE Sources will receive a warning letter for late filing their C-1PC and C-3/C-4 reports. The Commission will consider the circumstances surrounding the warning when evaluating future violations.

For this reason the PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing enforcement action in this case.

Thank you for bringing this matter to our attention. The process relies on citizens monitoring campaign activity to promote full compliance with the law. Your actions will contribute to better awareness of the campaign finance and disclosure laws.

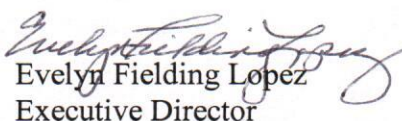
If you have questions, please contact me at (360) 586-1042, toll-free at 1-877-601-2828, or by e-mail at [tony.perkins@pdc.wa.gov](mailto:tony.perkins@pdc.wa.gov).

Sincerely,



Tony Perkins  
PDC Director of Compliance

Endorsed by:



Evelyn Fielding Lopez  
Executive Director

cc: RE Sources for Sustainable Communities