



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.pdcca.wa.gov

**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

In the Matter of Enforcement Action Against:

National Rifle Association of America
Washingtonians Opposed to I-594, and
National Rifle Association of America

Respondents.

Case No. 735

**Stipulation as to Facts,
Violations and Penalty**

The parties to this Stipulation, namely, the Public Disclosure Commission Staff, through its Executive Director, Evelyn Fielding Lopez, and Respondent National Rifle Association of America Washingtonians Opposed to I-594, and National Rifle Association of America, through its legal counsel, Jason Torchinsky and Steve Donaldson, submit this Stipulation as to Facts, Violations and Penalty in this matter. The parties agree that the Commission has the authority to accept, reject or modify the terms of this Stipulation. The parties further agree that in the event that the Commission suggests modification to any term of this agreement, each party reserves the right to reject that modification. In the event either party rejects a modification, this matter will proceed to hearing before the Commission.

JURISDICTION

The Public Disclosure Commission has jurisdiction over this proceeding pursuant to RCW 42.17A, the state campaign finance and disclosure laws; RCW 34.05, the Administrative Procedure Act; and WAC 390.

FACTS

1. On June 26, 2014, National Rifle Association of America: Washingtonians Opposed to I-594 (NRA WA No on I-594 PAC) filed a Committee Registration (C-1pc report) disclosing their opposition to Initiative 594, a Washington State statewide initiative.

2. The C-1pc report disclosed the mailing address for NRA WA No on I-594 PAC was 111250 Waples Mill Road, Fairfax Virginia, and its principal officers, Chris Cox, Chairman, and MaryRose Adkins, Treasurer, also were from Virginia.
3. During the 2014 election, NRA – WA No on I-594 PAC disclosed receiving \$489,331 in monetary contributions, and making expenditures totaling \$482,510 in opposition to I-594. Of the total contributions received by NRA – WA No on I-594 PAC, \$485,383 in monetary contributions were received from the National Rifle Association of America in Fairfax Virginia.
4. The National Rifle Association of America contributions were disclosed on eight C-3 reports filed by NRA – WA No on I-594 PAC and represented 99.1% of all contributions received by the committee.
5. NRA – WA No on I-594 PAC failed to timely file seven C-3 reports disclosing \$431,348 in monetary contributions received from the National Rifle Association. Those contributions were disclosed on C-3 reports between one and 35 days late. All C-3 reports filed by NRA – WA No on I-594 PAC were filed prior to the November 4, 2014, general election and included the complete name and address of each contributor including the aggregate totals, and the date each contribution was received and deposited.
6. On October 22, 2014, the NRA – WA No on I-594 PAC filed an amended Post-primary election C-4 report disclosing \$14,868 in previously unreported expenditures, and providing a sub-vendor breakdown of two previously reported committee expenditures made to Starboard Strategic, Inc.
7. The Post-Primary C-4 report was due to be filed by September 10, 2014, covering the period July 29 through August 31, 2014, and the amended information was disclosed 42 days late by NRA – WA No on I-594 PAC.
8. The information disclosed on the amended C-4 report included a \$14,868 expenditure made to Master Print on August 7, 2014 for printing No on I-594 initiative inserts, and a detailed breakdown of two expenditures made to Starboard Strategic, Inc. that included: (1) \$81,728 to Starboard Strategic, Inc. for an internet media buy; (2) \$22,950 to Starboard Strategic, Inc. for billboard advertisements with Dish Network and Direct TV; (3) \$16,852.50 for two expenditures for professional fees to AMAG (\$14,422.50) and Starboard Strategic, Inc.(\$2,430); and (4) \$10,001 through Starboard Strategic, Inc. to AMAG for production and

installation costs for the ads and taxes (\$4,531), Service Fees (\$3,850), and Commissions (\$810).

9. The National Rifle Association of America (NRA America) is a Lobbyist Employer in Washington State which required them to file a monthly L-3c report if they made contributions to support or oppose a statewide ballot proposition. The L-3c reports are required to be filed by a Lobbyist Employer no later than the 15th of the month, disclosing contributions made during the previous calendar month.
10. On October 14, 2014, NRA America filed two L-3c reports for July and August of 2014 disclosing the following NRA contributions made to the initiative PAC:

- The July 2014 L-3c report filed by NRA America disclosed a \$25,000 contribution made to NRA – WA No on I-594 PAC on July 11, 2014. The L-3c report was required to have been filed by NRA America no later than August 15, 2014, and was filed 60 days late.
- The August 2014 L-3c report filed by NRA America disclosed three monetary contributions totaling \$166,555 made to NRA – WA No on I-594 PAC as follows: (1) A \$35,000 contribution made on August 7, 2014; (2) A \$100,024 contribution made on August 18, 2014; and (3) A \$31,531 contribution made August 27, 2014. The L-3c report was required to have been filed by NRA America no later than September 15, 2014, and was filed 30 days late.

11. NRA – WA No on I-594 PAC:

- Inadvertently failed to note the weekly reporting requirement for C-3 reports, and acknowledged the contribution information was “... disclosed days to weeks later...” than the required report dates.
- Prior to becoming aware of the weekly C-3 reporting requirement, the committee “...had been filing C-3 report contemporaneously...” whenever the political committee electronically filed the required C-4 reports using the PDC’s Online Reporting of Campaign Activity (ORCA) campaign software.
- “...detected this discrepancy during an internal review of its operations in connection with the PDC Complaint...” and has timely and accurately filed the contributions received since becoming aware of the weekly filing requirements.

- "...believes it has undertaken all remedial action that it is possible to undertake with regards to this matter..." and that the corrective action undertaken...will ensure timely and accurate reporting.
- The Commission staff found no attempt on the part of the National Rifle Association to hide any information regarding contributions or expenditures from the Commission or the public. Because no further late filed reports have been found by the Commission, the Commission staff recognizes that the National Rifle Association and the NRA – WA No on I-594 PAC demonstrated a good faith effort to comply with the Commission regulations and reporting requirements. The Commission staff has no reason to believe that any violations described herein committed by National Rifle Association or the NRA – WA No on I-594 PAC were intentional.
- All of the contributions received by NRA – WA No on I-594 PAC were disclosed well in advance of the November 5, 2014 general election.

STATUTORY AND RULE AUTHORITY

RCW 42.17A.235 and **RCW 42.17A.240** require political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election, and in the month following the election, regardless of the level of activity. Beginning five months before the election, weekly C-3 reports are required to be filed every Monday disclosing contributions received and deposited during the previous week.

RCW 42.17A.630(2) states in part that an employer of a lobbyist shall file a special report with the commission if the employer makes a contribution or contributions aggregating more than one hundred dollars in a calendar month disclosing the date and amount of each such contribution and the name of the recipient committee receiving the contribution the contribution. The report shall be filed within fifteen days after the last day of the calendar month during which the contribution was made.

VIOLATIONS

- 1) Based on the Stipulation of Facts set forth above, Respondents National Rifle Association of America Washingtonians Opposed to I-594, and National Rifle Association of America violated RCW 42.17A as follows:

National Rifle Association of America Washingtonians Opposed to I-594: Violated RCW 42.17A.235, and 42.17A.240 on eight occasions by: (1) failing to timely file seven C-3 reports disclosing contributions received by the committee; (2) by failing to timely and fully disclose expenditure information on a C-4 report for expenditures undertaken in opposition to I-594.

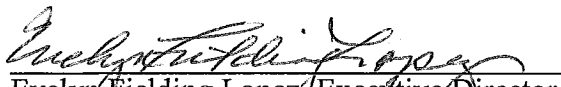
National Rifle Association of America: Violated RCW 42.17A.630 on two occasions by failing to timely file two Monthly Lobbyist Employer Contribution reports (L-3c report) as required for a Lobbyist Employer registered in Washington State, disclosing contributions made in opposition to I-594.

PENALTY

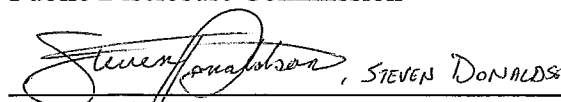
2) Based upon the Stipulation of Facts and Violations set forth above, the Respondents agree to the following:

- National Rifle Association of America Washingtonians Opposed to I-594 agrees to pay a \$10,000 civil penalty, which is payable within 60 days of the date of the Order.
- National Rifle Association of America agrees to pay a \$10,000 civil penalty, of which \$5,000 is suspended on the following conditions:
 - a. The National Rifle Association of America, and any future political committee sponsored by National Rifle Association of America, is not found to have committed any of the same or similar violations of the disclosure provisions of RCW 42.17A within four years of the date of the final order in this matter.
 - b. The National Rifle Association of America pays the \$5,000 non-suspended portion of the penalty within 60 days of the date of the final order.

3) Respondents National Rifle Association of America Washingtonians Opposed to I-594, and National Rifle Association of America PAC affirms its intention to comply in good faith with the provisions of RCW 42.17A in the future.


Evelyn Fielding Lopez, Executive Director
Public Disclosure Commission

5/9/2016
Date Signed


Name and Title, National Rifle Association
COUNSEL TO NRA, HOLTZMAN VOGEL JOSEFIAL TORCHINSKY, PLLC

5/5/16
Date Signed



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Notice of Administrative Charges

I. Jurisdiction

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state's campaign disclosure and contribution law; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

II. Allegations

2. Staff alleges that the National Rifle Association of America: Washingtonians Opposed to I-594, a political committee registered with the PDC violated RCW 42.17A.235 and 42.17A.240 by failing to timely file Monetary Contributions reports (C-3 reports) disclosing contributions received by the committee, and Summary Campaign Contribution and Expenditure reports (C-4 reports) disclosing expenditure activities undertaken in opposition to I-594.
3. Staff alleges that the National Rifle Association of America, a lobbyist employer registered with the PDC violated RCW 42.17A.630 by failing to timely file a Monthly Lobbyist Employer Contribution reports (L-3c report) as required for a Lobbyist Employer registered in Washington State, disclosing contributions made of more than \$100 to support or oppose a statewide ballot proposition.

III. Facts

National Rifle Association of America Washingtonians Opposed to I-594

4. On June 26, 2014, National Rifle Association of America: Washingtonians Opposed to I-594 (NRA WA No on I-594 PAC) filed a Committee Registration (C-1pc report) disclosing their opposition to Initiative 594, a statewide initiative concerning background checks for gun purchases.
5. The C-1pc report disclosed the mailing address for NRA WA No on I-594 PAC was located at 111250 Waples Mill Road, Fairfax Virginia, and its principal officers, Chris Cox, Chairman, and MaryRose Adkins, Treasurer, also were from Virginia.
6. During the 2014 election, NRA – WA No on I-594 PAC disclosed receiving \$489,331 in monetary contributions, and making expenditures totaling \$482,510 in opposition to I-594. Of the total contributions received by NRA – WA No on I-594 PAC, \$485,383 in monetary contributions were received from the National Rifle Association of America in Fairfax Virginia.
7. The National Rifle Association of America contributions were disclosed on eight C-3 reports filed by NRA – WA No on I-594 PAC and represented 99.1% of all contributions received by the committee. NRA – WA No on I-594 PAC failed to timely file seven C-3 reports disclosing \$431,348 in monetary contributions received from the National Rifle Association. Those contributions were disclosed on C-3 reports between one and 35 days late.
8. On October 22, 2014, the NRA – WA No on I-594 PAC filed an amended Post-primary election C-4 report disclosing \$14,868 in previously unreported expenditures, and providing a sub-vendor breakdown of two previously reported committee expenditures made to Starboard Strategic, Inc.
9. The Post-Primary C-4 report was due to be filed by September 10, 2014, covering the period July 29 through August 31, 2014, and the amended information was disclosed 42 days late by NRA – WA No on I-594 PAC.

10. The amended information submitted by NRA – WA No on I-594 PAC included a \$14,868 expenditure that had been made to Master Print on August 7, 2014 for printing No on I-594 initiative inserts, and a detailed breakdown of the two expenditures made to Starboard Strategic, Inc. for advertising and billboards.
11. The detailed breakdown included: (1) \$81,728 to Starboard Strategic, Inc. for an internet media buy; (2) \$22,950 to Starboard Strategic, Inc. for billboard advertisements with Dish Network and Direct TV; (3) \$16,852.50 for two expenditures for professional fees to AMAG (\$14,422.50) and Starboard Strategic, Inc.(\$2,430); and (4) \$10,001 through Starboard Strategic, Inc. to AMAG: for production and installation costs for the ads and taxes (\$4,531); Service Fees (\$3,850); and Commissions (\$810).

National Rifle Association of America

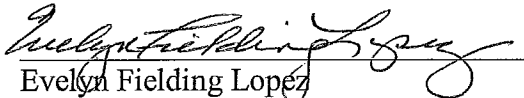
12. The National Rifle Association of America (NRA America) is a Lobbyist Employer in Washington State which required them to file a monthly L-3c report if they made contributions to support or oppose a statewide ballot proposition. The L-3c reports are required to be filed by a Lobbyist Employer no later than the 15th of the month, disclosing contributions made during the previous calendar month.
13. On October 14, 2014, NRA America filed two L-3c reports for July and August of 2013, disclosing the NRA contributions made to the initiative PAC as follow:
 - The July 2014 L-3c report was filed by NRA America disclosed a \$25,000 contribution made to NRA – WA No on I-594 PAC on July 11, 2014. The L-3c report was required to have been filed by NRA America no later than August 15, 2014, and was filed 60 days late.
 - The August 2014 L-3c report filed by NRA America disclosed three monetary contributions totaling \$166,555 made to NRA – WA No on I-594 PAC on August 7, 2014 (\$35,000); August 18, 2014 (\$100,024); and August 27, 2014 (\$31,531). The L-3c report was required to have been filed by NRA America no later than September 15, 2014, and was filed 30 days late.


IV. Law

RCW 42.17A.235 and **RCW 42.17A.240** require political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election, and in the month following the election, regardless of the level of activity. Beginning five months before the election, weekly C-3 reports are required to be filed every Monday disclosing contributions received and deposited during the previous week.

RCW 42.17A.630(2) states in part that an employer of a lobbyist shall file a special report with the commission if the employer makes a contribution or contributions aggregating more than one hundred dollars in a calendar month disclosing the date and amount of each such contribution and the name of the recipient committee receiving the contribution the contribution. The report shall be filed within fifteen days after the last day of the calendar month during which the contribution was made.

RESPECTFULLY SUBMITTED this 22nd day of January, 2016.


Evelyn Fielding Lopez
PDC Executive Director

 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 208 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 763-1111 Toll Free 1-877-691-2828		Political Committee Registration		C1PC (1/12)		100587540 06-26-2014	
Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) NATIONAL RIFLE ASSOCIATION OF AMERICA WASHINGTONIANS OPPOSED TO I-594				Acronym:			
Mailing Address 11250 WAPLES MILL ROAD				Telephone: 703-267-1155			
City FAIRFAX		County THURSTON		Zip + 4 22030		Fax: 703-267-3942	
NEW OR AMENDED REGISTRATION? <input checked="" type="checkbox"/> NEW. Complete entire form. <input type="checkbox"/> AMENDS previous report. Complete entire form.				COMMITTEE STATUS <input type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input checked="" type="checkbox"/> <u>2014</u> election year only. Date of general or special election: <u>11/04/2014</u> (Year)			
1. What is the purpose or description of the committee? <input type="checkbox"/> Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.							
<input checked="" type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure: BACKGROUND CHECKS ON ALL GUN PURCHASES						Ballot Number <u>594</u> FOR <input type="checkbox"/> AGAINST <input checked="" type="checkbox"/>	
<input type="checkbox"/> Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name:							
For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, identify the party:							
2. Related or affiliated committees. List name, address and relationship. <input type="checkbox"/> Continued on attached sheet.							
3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.) If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options. <input type="checkbox"/> MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor.							
<input checked="" type="checkbox"/> FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.							
4. Campaign Manager's or Media Contact's Name and Address CHRIS W COX 11250 WAPLES MILL ROAD, FAIRFAX VA 22030				Telephone Number: 703-267-1140			
5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes ___ No <u>X</u> . See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. MARYROSE ADKINS 11250 WAPLES MILLS ROAD, FAIRFAX VA 22030				Daytime Telephone Number: 703-267-1155			
6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. <input type="checkbox"/> Continued on attached sheet.							
7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." <input type="checkbox"/> Continued on attached sheet. CHRIS W. COX, CHAIRMAN, 11250 WAPLES MILL ROAD, FAIRFAX VA 22030 MARYROSE ADKINS, TREASURER, 11250 WAPLES MILL ROAD, FAIRFAX VA 22030							
8. Campaign Bank or Depository WELLS FARGO BANK, N.A.		Branch MCLEAN		City MCLEAN, VIRGINIA			
9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address. Street Address, Room Number, City where campaign books will be available for inspection 11250 WAPLES MILL ROAD, FAIRFAX In order to make an appointment, contact the campaign at (telephone, fax, e-mail): (703) 267-1155 (703) 267-3942 MADKINS@NRAHQ.ORG							
10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.				11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge. Committee Treasurer's Signature MARYROSE ADKINS			
<input checked="" type="checkbox"/> A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.				Date 06-26-2014			

Jon Ammons

From: KATHERINE HOLMES [holmeskatherine@hotmail.com]
Sent: Friday, October 17, 2014 4:42 PM
To: PDC
Subject: NRA Complaint
Attachments: NRA complaint.doc

To whom it may concern at the Washington State Public Disclose Complaint commission,

I would like to file a complaint against the NRA in reference to their contributions in the 594 referendum race. Press reports show clearly that the NRA is not being straight with Washington voters. Public disclosure laws are in place for a reason, and it hurts Washington voters when powerful out-of-state interests - especially the gun lobby - try to skirt them. Please see attached document.

Thank you,
Katherine Holmes

Sent from my Verizon Wireless 4G LTE DROID

Office Use Only: No. _____



**WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION
COMPLAINT FORM**

(See instructions on the last page.)

Description of Complaint

1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

National Rifle Association of America Washingtonians Opposed to I-594

11250 Waples Mill Rd., Fairfax, VA 22030

Phone: (703) 267-1155, Email: madkins@nrahq.org, Website: VoteNo594.com

2. ALLEGED VIOLATIONS:

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. *(Note that the*

The National Rifle Association of America Washingtonians Opposed to I-594 is alleged to have violated RCW 42.17A.235(2)(c) and RCW 42.17A.235(3). In clear violation of reporting requirements, the organization did not file reports with the Public Disclosure Commission between September 10, 2014 and October 14, 2014. This is an obvious and egregious violation and ostensibly an attempt to hide vital information from the public. While less severe in nature, the organization also reported donations outside the required time period on September 10, 2014, and August 18, 2014.

Evidence and Witnesses

2. EVIDENCE:

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

Reports dated September 10, 2014 and October 14, 2014 are available through the PDC

website at <https://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100600982> and

<https://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100607501> respectively. Additionally,

the Associated Press reported on October 14, 2014 that the organization had received a \$150,000 contribution in September, but not made the information available in a PDC report before October 14, 2014. A screenshot of the story is included below and it is available at <http://www.komonews.com/news/local/NRA-donates-150K-more-in-fight-against-I-594-279215002.html>. Further, PubliCola published a story on October 16, 2014 describing the delay in the reporting and the issue with the delay; a screenshot of the applicable portion of the story is included below, and the story is available at: <http://www.seattlemet.com/news-and-profiles/publicola/articles/morning-fizz-a-special-session-for-transportation-funding-and-not-k-12-funding-october-2014>.

NRA donates \$150K more in fight against I-594

By Associated Press | Published: Oct 14, 2014 at 4:58 PM PDT | Last Updated: Oct 14, 2014 at 6:20 PM PDT

Recommend 1K 3-1-0 Tweet 132 Comments Print Email



FILE - In this photo taken Feb. 16, 2013, a pistol is displayed for sale by gun collector Steve Frost during the Sports Connection Gun Show in Yakima, Wash. (AP Photo/Yakima Herald Republic, TJ Mullinax, File)

OLYMPIA, Wash. (AP) - The National Rifle Association has donated an additional \$150,000 to its political action committee in Washington to fight a measure seeking universal background checks on gun sales and transfers.

The donation was made last month, but posted Tuesday to the state's Public Disclosure Commission's website. The committee has now raised more than \$422,000 and spent more than \$373,000 against Initiative 594, which would require background checks for all gun sales and transfers in Washington state, including at gun shows and for private sales, with some exemptions. Proponents of I-594 have raised more than \$8.6 million.

A rival campaign, Initiative 591, would prevent the state from adopting background-check laws that go beyond the national standard, which requires the checks for sales by licensed dealers but not for purchases from private sellers. The NRA has not endorsed that measure.

3. National Rifle Association of America Washingtonians Opposed to I-594—local NRA activists who are campaigning against November's gun control measure—appear to be playing fast and loose with Washington's Public Disclosure Commission, the agency that oversees campaign finance disclosure.

The anti-594 group received a \$150 thousand contribution from the national NRA (out of the \$431,847 the NRA has contributed in total) a month ago, but only got around to filing that cash with the PDC earlier this week.

The problem? Campaign finance rules require cash contributions to be filed by the first Monday after their receipt, according to the PDC's Lori Anderson. However, Anderson says, the PDC normally doesn't investigate this kind of delayed report unless a citizen submits a formal complaint, which hasn't happened yet.

NRA Washingtonians Opposed to I-594, which has reported raising \$432,596 overall with three individual contributions on top of the NRA checks, are already being looked at by the PDC because of a complaint submitted earlier this month alleging the group has severely under-reported its campaign fundraising and spending. The complainant points to a NW News Network interview in which an NRA spokesperson estimated that her group had spent almost double what it has reported to the PDC. Whether that spending should have been reported remains to be seen: the PDC is currently deciding whether the complaint warrants a formal investigation.

We've got a call in to anti-594 group's treasurer.

SIGN UP!



Seattle Met and Puget Sound deliver breaking news and essential updates from around the Northwest. See an example!

File Under: Morning Ffzz, Suzan DalBene, Steve Litzow, Transportation Funding, NRA, McCleary Decision, Gender Equity, Pedro Cello, I-594

3. WITNESSES:

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

Unknown at this time.

Certification

In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Katherine Holmes

Telephone number 360-739-5061

E-mail address (optional)

Oath

Required for complaints against elected officials or candidates for elective office:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature _____ Katherine Holmes

Date signed

10/17/14

Place signed (city and county)

Seattle, Washington

King

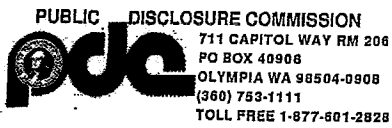
County

Attachments

€ Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint. (copy of letter attached)

**RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."*

Washington State Public Disclosure Commission



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

THIS SPACE FOR OFFICE USE

100597408

08-18-2014

Candidate or Committee Name (Do not abbreviate. Use full name.)
National Rifle Association of America Washingtonians Opposed to I-594

Mailing Address
11250 Waples Mill Road

City Zip+4 Office Sought (candidates) Election Date
Fairfax, VA 22030 2014

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (Interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
07/11/14	NATIONAL RIFLE ASSOCIATION 11250 Waples Mill Road Fairfax, VA 22030				25,000.00	25,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			25,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

25,000.00

4. Date of Deposit

07/11/14

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

MaryRose Adkins

08-18-2014

Treasurer's Daytime Telephone No.: (703) 267-1155

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (102)

THIS SPACE FOR OFFICE USE
 100600658
 09-09-2014

Candidate or Committee Name (Do not abbreviate. Use full name.)
 National Rifle Association of America Washingtonians Opposed to I-594

Mailing Address
 11250 Waples Mill Road

City Zip + 4 Office Sought (candidates) Election Date
 Fairfax, VA 22030 2014

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I	G E N	Amount	Aggregate* Total
08/07/14	NATIONAL RIFLE ASSOCIATION 11250 Waples Mill Road Fairfax, VA 22030				35,000.00	60,000.00
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			35,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

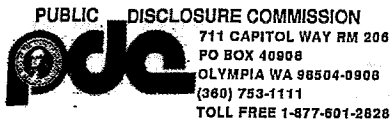
35,000.00

4. Date of Deposit
 08/07/14

Treasurer's Daytime Telephone No.: (703) 267-1155

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: MaryRose Adkins
 Date: 09-09-2014



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

THIS SPACE FOR OFFICE USE

100600976

09-10-2014

Candidate or Committee Name (Do not abbreviate. Use full name.)
National Rifle Association of America Washingtonians Opposed to I-594

Mailing Address
11250 Waples Mill Road

City Zip + 4 Office Sought (candidates) Election Date
Fairfax, VA 22030 2014

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		217.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L.....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
08/18/14	NATIONAL RIFLE ASSOCIATION 11250 Waples Mill Road Fairfax, VA 22030				100,024.00	160,024.00
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			100,024.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

100,024.00

4. Date of Deposit

08/18/14

Treasurer's Daytime Telephone No.: (703) 267-1155

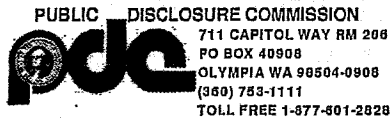
I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

MaryRose Adkins

Date

09-10-2014



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

THIS SPACE FOR OFFICE USE
100600977
09-10-2014

Candidate or Committee Name (Do not abbreviate. Use full name.)
National Rifle Association of America Washingtonians Opposed to I-594

Mailing Address
11250 Waples Mill Road

City: Fairfax, VA Zip + 4: 22030 Office Sought (candidates): Election Date: 2014

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		217.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L.....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I N T	G E N E R A L	Amount	Aggregate* Total
08/27/14	NATIONAL RIFLE ASSOCIATION 11250 Waples Mill Road Fairfax, VA 22030				31,531.08	191,555.08
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			31,531.08	
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

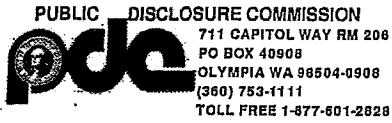
31,531.08 *See reverse for details.

4. Date of Deposit: 08/27/14

Treasurer's Daytime Telephone No.: (703) 267-1155

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: MaryRose Adkins Date: 09-10-2014



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

THIS SPACE FOR OFFICE USE
100607496
10-14-2014

Candidate or Committee Name (Do not abbreviate. Use full name.)
National Rifle Association of America Washingtonians Opposed to I-594

Mailing Address
11250 Waples Mill Road

City Zip + 4 Office Sought (candidates) Election Date
Fairfax, VA 22030 2014

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous		217.00
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L.....		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I N	G E N	Amount	Aggregate* Total
09/04/14	NATIONAL RIFLE ASSOCIATION 11250 Waples Mill Road Fairfax, VA 22030				39,792.76	231,347.84
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			39,792.76	
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

39,792.76

*See reverse for details.

4. Date of Deposit

09/04/14

I certify that this report is true and complete to the best of my knowledge

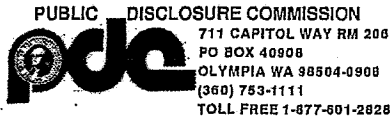
Treasurer's Signature

Date

MaryRose Adkins

10-14-2014

Treasurer's Daytime Telephone No.: (703) 267-1155



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

THIS SPACE FOR OFFICE USE
100607498
10-14-2014

Candidate or Committee Name (Do not abbreviate. Use full name.)
National Rifle Association of America Washingtonians Opposed to I-594

Mailing Address
11250 Waples Mill Road

City Fairfax, VA Zip + 4 22030 Office Sought (candidates) Election Date 2014

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous		274.00
b. Candidate's personal funds deposited in the bank (Include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L.....		
d. Miscellaneous receipts (Interest, refunds, auctions, other). Attach explanation		
e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I	G E N	Amount	Aggregate* Total
09/16/14	NATIONAL RIFLE ASSOCIATION 11250 Waples Mill Road Fairfax, VA 22030				150,000.00	381,347.84
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			150,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

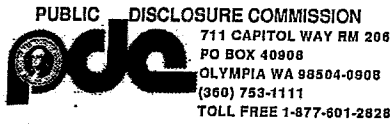
150,000.00

4. Date of Deposit: 09/16/14

Treasurer's Daytime Telephone No.: (703) 267-1155

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: MaryRose Adkins Date: 10-14-2014



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(102)

THIS SPACE FOR OFFICE USE

100607499

10-14-2014

Candidate or Committee Name (Do not abbreviate. Use full name.)
 National Rifle Association of America Washingtonians Opposed to I-594

Mailing Address
 11250 Waples Mill Road

City Zip + 4 Office Sought (candidates) Election Date
 Fairfax, VA 22030 2014

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		274.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I N T	G E N E R A L	Amount	Aggregate* Total
10/08/14	NATIONAL RIFLE ASSOCIATION 11250 Waples Mill Road Fairfax, VA 22030				50,000.00	431,347.84
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			50,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

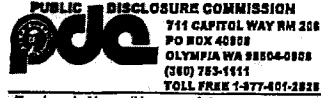
50,000.00

4. Date of Deposit
 10/08/14

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature Date
 MaryRose Adkins 10-14-2014

Treasurer's Daytime Telephone No.: (703) 267-1155



Employer of Lobbyist Monthly Political Contribution Report

L-3c
1/02

THIS SPACE FOR OFFICE USE

DATE FILED PDC

OCT 14 2014

Employer's Name (Use complete company, association, union or entity name.)

National Rifle Association of America

Mailing Address

11250 Waples Mill Road

City State Zip

Fairfax VA 22030

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

What Must Be Reported: Contributions, including a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, or transfer of anything of value, including personal and professional services for less than full consideration. Contributions to campaign accounts and public office fund accounts are reportable.

When Is The Report Filed: Within 15 days after the last day of each calendar month during which reportable contributions were made. Reports are considered filed as of the post mark or hand-delivery date to PDC.

Itemize contributions that alone, or together with other contributions to the same recipient, total over \$100 during the calendar month specified above. If space provided is insufficient, use additional L-3c forms or 8 1/2" x 11" white paper.

Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
7/11/2014	National Rifle Association of America Washingtonians Opposed to I-594 (address attached)	Monetary	\$25,000.00

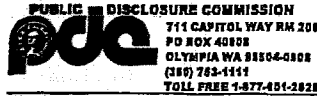
*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf
Charles Cunningham, Director, State & Local

Signature

Date



Employer of Lobbyist Monthly Political Contribution Report

L-3C
1/02

THIS SPACE FOR OFFICE USE

DATE FILED PDC

OCT 14 2014

Employer's Name (Use complete company, association, union or entity name.)

National Rifle Association of America

Mailing Address

11250 Waples Mill Road

City

Fairfax

State

VA

Zip

22030

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

What Must Be Reported: Contributions, including a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, or transfer of anything of value, including personal and professional services for less than full consideration. Contributions to campaign accounts and public office fund accounts are reportable.

When Is The Report Filed: Within 15 days after the last day of each calendar month during which reportable contributions were made. Reports are considered filed as of the post mark or hand-delivery date to PDC.

Itemize contributions that alone, or together with other contributions to the same recipient, total over \$100 during the calendar month specified above. If space provided is insufficient, use additional L-3c forms or 8 1/2" x 11" white paper.

Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
8/7/2014	National Rifle Association of America Washingtonians Opposed to I-594 (address attached)	Monetary	\$5,000.00
8/18/2014	National Rifle Association of America Washingtonians Opposed to I-594 (address attached)	Monetary	\$100,024.00
8/27/2014	National Rifle Association on America Washingtonians Opposed to I-594 (address attached)	Monetary	\$31,531.08

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf
Charles Cunningham, Director, State & Local

Signature

Date

HOLTZMAN VOGEL JOSEFIAK PLLC
Attorneys at Law

45 North Hill Drive
Suite 100
Warrenton, VA 20186
p/540-341-8808
f/540-341-8809

November 3, 2014

Philip E. Stutzman
Director of Compliance
State of Washington Public Disclosure Commission
711 Capitol Way, Rm. 206
Olympia, WA 98504

RECEIVED

NOV -4 2014

Public Disclosure Commission

Re: Response to Notice of Complaint No. T15-072

Dear Mr. Stutzman,

This response is submitted by National Rifle Association of America Washingtonians Opposed to I-594 (the "Committee") in response to the above referenced complaint (the "Complaint"). As you are aware, the Committee registered, and began appropriately reporting to the Public Disclosure Commission (the "PDC"), as a Washington ballot initiative committee in June of 2014.

Allegations

Although the Complaint enumerates only one allegation against the Committee, that single enumerated allegation makes several, separate sub-allegations. A summary of each sub-allegation, along with the Committee's response, appears below.

1. The first sub-allegation is that by failing to file reports between September 10 and October 14, 2014, the Committee violated RCW 42.17A.235(3), which, in summary, requires filing C-3 reports weekly beginning June 1, immediately prior to a general election.

From the inception of the Committee until approximately October 10, 2014, the Committee inadvertently failed to note the weekly reporting requirement for C-3 reports. The Committee detected this discrepancy during an internal review of its operations in connection with PDC Complaint No. T15-061. Prior to detecting this error, the Committee had been filing C-3 reports contemporaneously with its required C-4 reports, as would have been appropriate prior to June 1. Since detecting the error, the Committee has filed a C-3 report not later than the Monday immediately following the deposit of each contribution received, in compliance with Washington law. The last contribution that the Committee failed to timely file was a deposit of

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NOV -4 2014

Public Disclosure Commission

\$50,000 that was made on October 8, 2014, which should have been reported not later than Monday, October 13, but was instead reported on a C-3 filed Tuesday, October 14, 2014. Subsequent amendment of the filing dates of the untimely C-3s would not correct the underlying errors, and ORCA does not appear to permit such amendments in any event. Therefore, the Committee believes it has undertaken all remedial action that it is possible to undertake with regard to this matter.

The Committee would also note that all of its C-3 reports – including the reports filed before the Committee detected its error -- have been complete and accurate. Although the Committee acknowledges that the information contained on many reports was disclosed days to weeks later than it should have been, the Committee ultimately did disclose all contributions it received, and did so far in advance of the election. The public has suffered no substantial prejudice from the Committee's error, and that error has been corrected going forward. Therefore, the Committee respectfully requests that the PDC exercise its authority under RCW 42.17A.755(5) and waive any potential penalty.

2. The second sub-allegation is that by failing to file reports between September 10 and October 14, 2014, the Committee violated RCW 42.17A.235(2)(c). In summary, that statute establishes the tenth of each month as the default date for filing of C-4 reports, for months in which no other C-4 reports are due.

The Committee denies this sub-allegation. A plain-language reading of RCW 42.17A.235(2), as well as the PDC's own *Political Committee Reporting Guide* dated January, 2014¹, demonstrates that no C-4 report was required to be filed between September 10 and October 14, 2014. A C-4 report would have been due on October 10, had the twenty-one day pre-general election report not also been due in the month of October.

3. The third sub-allegation is that the Committee "also reported donations outside the required time period on September 10, 2014, and August 18, 2014."

The Committee interprets this claim as simply repeating the first sub-allegation, but with respect to weekly C-3 reports that were due prior to September 10, 2014. Assuming this interpretation is correct, the Committee has already addressed this sub-allegation in its response to sub-allegation 1, above. Otherwise, this sub-allegation is insufficiently clear and specific to permit a response.

4. The complainant additionally alleges that the first two sub-allegations were "ostensibly an attempt to hide vital information from the public."

¹ <http://www.pdc.wa.gov/archive/guide/brochures/pdf/2014/2014.Political.committee.reporting.guide.pdf>

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NOV -4 2014

Public Disclosure Commission

To the extent that this is a separate sub-allegation, it is outrageous and completely without evidentiary support, and the Committee denies it. Clearly, had the Committee set out to “hide” the sources or other details of contributions it received, it would not have done so by reporting those contributions accurately but untimely – an approach virtually certain to result in a complaint, and scrutiny from the PDC. Presumably, committees that wish to “hide vital information from the public” concerning contributions *simply do not report those contributions at all.*

Conclusion

The Committee appreciates the PDC’s invitation to respond to the Complaint. The Committee acknowledges its error with respect to the timely filing of C-3 reports prior to early October, 2014 – an error that the Committee has since corrected. Even when the Committee’s C-3 reports were untimely filed, they always included the correct and complete amounts of contributions received. The Committee, therefore, respectfully requests that the PDC decline to assess any penalty against the Committee for its error. The Committee respectfully denies all allegations in the Complaint other than those relating to the untimely filing of C-3 reports.

Sincerely,



Sean Cairncross
Chris Winkelman
*Counsel to National Rifle Association of
America Washingtonians Opposed to I-594*

DATE FILED PDC

NOV 04 2015

HOLTZMAN VOGEL JOSEFIAK PLLC
Attorneys at Law

45 North Hill Drive
Suite 100
Warrenton, VA 20186
p/540-341-8808
f/540-341-8809

November 3, 2015

Tony Perkins
Director of Compliance
State of Washington Public Disclosure Commission
711 Capitol Way, Rm. 206
Olympia, WA 98504

Re: Supplemental Response to PDC Case No. 735

Dear Mr. Perkins,

This response is submitted by National Rifle Association of America: Washingtonians Opposed to I-594 (the "Committee") as a supplement to the previously-filed response to Complaint No. T15-072 (the "Complaint"). As you are aware, the Committee registered, and began appropriately reporting to the Public Disclosure Commission (the "PDC"), as a Washington ballot initiative committee in June of 2014.

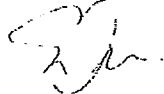
The Committee appreciates the PDC's invitation to provide a supplemental response to the Complaint and incorporates all previous information as it was provided on November 3, 2014. The Committee acknowledges its error with respect to the timely filing of C-3 reports prior to early October, 2014 – an error that the Committee immediately sought to correct upon its discovery. Although the Committee's C-3 reports were untimely, disclosure reports were filed prior to the election and always included the correct and complete sources and amounts of contributions received. The Committee timely filed all other reports but for the C-3 reports. As such, it is clear that the Committee has made no attempt to hide any information regarding contributions or expenditures from the PDC or the public, and made a good-faith attempt to comply with all PDC filing requirements. Since the filing of the complaint, the Committee corrected previous procedural flaws to ensure timely reporting in addition to its best practices implemented for accurate reporting.

The Committee, therefore, respectfully requests that the PDC decline to assess any penalty against the Committee for its error. The Committee respectfully denies all allegations in the Complaint other than those relating to the untimely filing of C-3 reports.

DATE FILED PDC

NOV 04 2015

Sincerely,



Sean Cairncross
Chris Winkelman
*Counsel to National Rifle Association of
America Washingtonians Opposed to I-594*