



**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 29, 2023

Delivered electronically to Andrew (Andreas) Koeppen at [win@akoeppen.com](mailto:win@akoeppen.com) and [sales@hototp.com](mailto:sales@hototp.com)

Subject: Complaint filed by Jon Smith, PDC Case 144847

Dear Andrew Koeppen:

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

As noted in the letter to Mr. Smith, the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff reminds you about the importance of making commercial advertiser documents and books of account open for public inspection during normal business hours for five years following the election to which the materials pertain. You may also provide the records electronically in one of the methods specified by WAC 390-18-050. PDC staff expects in the future that you will abide by all applicable laws, rules, and guidelines related to the obligations of a commercial advertiser.

If you have questions, you may contact Tanya Mercier by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

*/s/ Electronically signed*

Tanya Mercier  
Compliance Officer

Endorsed by,

*/s/ Electronically signed*

Kim Bradford  
Deputy Director  
For Peter Frey Lavallee  
Executive Director



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December 29, 2023

Delivered electronically to Jon Smith at [jonsmith1952@gmail.com](mailto:jonsmith1952@gmail.com)

Subject: Complaint against Goat Professional Services, PDC Case 144847

Dear Jon Smith:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on November 2, 2023. The complaint alleged that Goat Professional Services, located in Grant County, may have violated RCW 42.17A.345 and WAC 390-18-050 by failing to provide inspection of a commercial advertiser's books of account.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The Respondent has been in business since January 2022 providing professional services that include printing and marketing services. Based on this activity, the Respondent is a "commercial advertiser" as defined in RCW 42.17A.005(10) & WAC 390-18-050.
- RCW 42.17A.345 & WAC 390-18-050 require commercial advertisers to make their documents and books of account open for public inspection during normal business hours for five years following the election to which the records pertain. Pursuant to RCW 42.17A.345, the documents and books of account shall specify 1) the names and addresses of persons from whom it accepted political advertising or electioneering communications; 2) the exact nature and extent of the services rendered; and 3) the total cost and the manner of payment for the services. WAC 390-18-050(3) states that commercial advertisers can provide such information to the requester in person during normal business hours or electronically (if requested electronically) by email or online publication.
- PDC staff determined Mr. Smith appeared in person and gave to Mr. Koeppen a written request on October 19, 2023. The letter addressed to Mr. Koeppen, rather than Goat Professional Services, cited outdated PDC statutes and made a broad request for information that included a period that Goat Professional Services was not in business. Mr. Koeppen stated to the PDC Compliance Officer,

“On October 5<sup>th</sup>, during a meeting Mr. Smith threatened me with violence, which is particularly concerning since he carries a firearm. On 10/19/23 he approached me and was very agitated slamming down an envelope, which contained the letter.”

Based on the information provided by Mr. Smith in his letter and because of the way he appeared before Mr. Koeppen with the inspection request, Mr. Koeppen “did not feel it was an appropriate request” and did not allow Mr. Smith at that time to review his commercial advertiser books of account. However, Mr. Koeppen did not attempt to clarify with Mr. Smith what specific information he wanted to review.

- Mr. Koeppen and Mr. Smith worked effectively with the PDC Compliance Officer to narrow the scope of the request and identify affirmative records for review. Mr. Koeppen indicated that “we did not print for any candidates in 2022. We did some minor printing for a handful of candidates in 2023.” Both parties agreed to the 2023 materials and that an inspection would occur. The PDC gave both parties until December 15, 2023, to schedule and conduct the in-person inspection.
- On December 17, 2023, Mr. Koeppen informed the PDC that “despite our prompt preparation of the requested materials, Mr. Smith did not reach out to schedule a viewing of the books.” On December 18, 2023, PDC staff spoke with Mr. Smith, and he confirmed that he had not followed-up to inspect the books of account.
- The Respondent does not have other similar warnings or violations of PDC requirements.

Based on our findings staff has decided that, in this instance, failing to provide inspection of a commercial advertiser’s books of account does not amount to a violation that calls for further investigation.

PDC staff reminded Mr. Andrew Koeppen about the importance of making commercial advertiser documents and books of account open for public inspection for five years following the election to which the materials pertain. The records may also be provided electronically in one of the methods specified by WAC 390-18-050. PDC staff expects in the future that Mr. Koeppen will abide by all applicable laws, rules, and guidelines related to the obligations of a commercial advertiser.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s/ Electronically signed

Tanya Mercier  
Compliance Officer

Endorsed by,

/s/ Electronically signed

Kim Bradford  
Deputy Director  
For Peter Frey Lavallee  
Executive Director

cc: Andrew Koeppen