



March 13, 2024

Tanya Mercier, Compliance Officer
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

VIA ELECTRONIC DISTRIBUTION ONLY

RE: PDC Complaint No. 149327

Dear Tanya Mercier:

I am responding on behalf of my client, CT Publishing, to your email of February 27, 2024, requesting a response to PDC Complaint No. 149327 filed by Kyle Wheeler.

CT Publishing is based in Chehalis, Washington, and, as a small-town company, was unaware of the existence of RCW 42.17A.345 or WAC 90-18-050 until contacted by Mr. Wheeler. In particular, CT publishing was surprised that the public could access company records that in almost any other circumstance are not available to the public.

Once CT Publishing was informed by campaign finance and public disclosure legal counsel of the requirements of RCW 42.17A.345 and WAC 90-18-050, CT publishing began assembling the records requested by Mr. Wheeler. However, the records were not organized or formatted in such a matter manner that would allow immediate and complete disclosure. Instead, CT Publishing and its related companies compiled what data it had and provided it to Mr. Wheeler once the data was located.

Remediation

With the benefit of time, CT Publishing now understand the obligations of RCW 42.17A.345 and WAC 90-18-050 and has taken the following measures:

1. All records requested by Mr. Wheeler are now available to the extent that they exist.
2. CT Publishing and related entities now have created an internal record retention and data fulfillment process to ensure timely and complete disbursement of any information requested under RCW 42.17A.345 and WAC 90-18-050.
3. Email accounts, disclosure@chronicle.com and disclosure@silveragency.com have been created to service any such information requests made to CT publishing and any related entities and the respective inboxes that will be checked frequently.

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4. CT Publishing has retained an experienced campaign finance and public disclosure law firm, Dan Brady Law, to assist in compliance with RCW 42.17A.345 and WAC 90-18-050 going forward.

I hope you find this information useful, and please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Brady", written in a cursive style.

Dan Brady