

November 14, 2018

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission:

Thank you for the opportunity to respond to Case #42554 as submitted by Andrew Saturn, candidate for Thurston County Public Utility District Commissioner. I understand that Mr. Saturn has submitted additional items to be included in the original complaint, so I will address each of the items in this correspondence.

1. The C6 filed for the mailer in question had the “check to support” option unchecked in error at the time of the original filing. I noticed the error and promptly filed an amendment (<http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=C6-8932>). I filed the amendment before the PDC forwarded Mr. Saturn’s complaint to me. Additionally, our C4 report, filed on 10/30 clearly shows that the two expenses related to the mailer on the subsequent C6 are, in fact, pro-Linda Oosterman expenses (<http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100870852>). This pre-dates the complaint as filed by Mr. Saturn. Therefore, his claims are false.
2. This claim is false. It is not required to have a campaign manager or campaign committee for political committees unless they are “authorizers” or “controllers” of the campaign. As the sole person signer on the bank account, I am already listed on the C1. The PDC has affirmed through numerous Glen Morgan complaints that adding the treasurer again in the Committee member section is not required and is redundant. Additionally, none of the donors or vendors meet the threshold. If the PDC disagrees, I am happy to amend the C1PC report to reflect the deviation from previous practice.
3. Based on multiple conversations I have had with the PDC about sponsorship, I believe I am not required to be listed on the mailer as a sponsor because I am a ministerial treasurer. Based on the best advice I’ve received from the PDC previously on similar campaigns.

I believe that Up for Thurston County has listed the sponsorship disclaimer properly on the mailer as you can see from the attachment Mr. Saturn provided: “No candidate authorized this ad. It is paid for by Up for Thurston County, 120 State Ave NE, #174, Olympia, WA 98501. Top 5 Contributors: National Women’s Political Caucus of WA Campaign Fund and Puget Sound Energy.” Additional donors under the \$700 threshold, although not required, were also added for extra transparency.

4. This claim is false. This was an independent effort without the benefitting candidate’s authorization or knowledge. Therefore, the contribution limit, coordination, and

earmarking claims are neither factual nor relevant. Additionally, with in-kind contributions and the refund I've submitted back to Puget Sound Energy, they are below the sponsorship threshold. Mr. Saturn should know this because his surrogate, Kevin Pestinger, was provided this exact information during an open book inspection the morning of November 1st (the day Mr. Saturn filed his additional grievances). Therefore, he knows very well that Puget Sound Energy does not meet the sponsorship threshold. Lastly, Puget Sound Energy is listed clearly on the disclaimer in the attached mailer he sent so arguments that there was concealment are clearly false.

In conclusion, I believe that the mailer properly discloses the donors and disclaimer language at the time of printing.

5. From my understanding, Paul Berendt had very limited involvement with Up for Thurston County and would be considered, at best, a volunteer vendor on the committee. Up for Thurston County will be properly reporting his design time as an in-kind on the next C4 report, due December 10th. From my understanding, he did not authorize an expense and essentially delivered photos and copy to the print house for a mailer. If the PDC has broadened their definition of what constitutes a committee member to include this specific task on a campaign, then I am happy to amend the C1PC to reflect that change.
6. The rest of the added commentary Mr. Saturn provides is hard to follow and therefore difficult to address. Also, I do not see the referenced attachments of minutes and Rodney Anderson print notes so I cannot address those claims. What I can say with confidence: I have had zero contact with Kelsey Hulse and absolutely no contact with Danielle Westbrook, other than to process the \$20 donation she made. My contact with Paul Berendt might possibly represent an hour or two worth of communication in total. This small independent expenditure campaign is a total of one mailer and voter contact totaling about \$8,000. It is nowhere near the image Mr. Saturn paints in his complaint.

Additionally, I have had zero contact with the Oosterman campaign and had no knowledge of their plans or shared information with their campaign or had information shared with me.

I have worked with the Public Disclosure Commission for more than two decades to ensure candidates and political committees remain compliant and transparent. You know my work ethic is to employ best-faith efforts to comply with any and all laws, particularly around independent expenditures. Therefore, I hope the PDC recognizes that this complaint is baseless and dismisses it as such.

Thank you for allowing me the opportunity to address this matter.

Sincerely,

Jason Bennett, Treasurer
Up for Thurston County