



**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.pdcc.wa.gov

December 19, 2018

Delivered electronically to “info@argo.us”

Subject: PDC Case 42518

Dear Up for Thurston County:

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

As noted below to Andrew Saturn, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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December 19, 2018

Delivered electronically to “saturn@gmail.com”

Subject: Complaint regarding Up For Thurston County; PDC Case 42554

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on November 1, 2018. Your complaint alleged that Up For Thurston County may have violated Chapter 42.17A RCW for failure to accurately disclose independent expenditures/electioneering communications, committee officers, and controlling entities.

PDC staff reviewed your allegations, and as a result of staff’s initial review, we found the following:

- Up for Thurston County filed their initial C-1pc on 10/15/18, listing only Jason Bennett as a Treasurer performing ministerial duties.
- Per WAC 390-05-243, a treasurer may be designated as performing only ministerial duties, when they perform campaign finance related clerical support or recordkeeping at the direction of candidates or political committee officers.
- When an officer is listed as performing only ministerial duties, they are not considered an officer of the political committee and can perform the same or similar functions for multiple political committees without creating the presumption of communication and collaboration between committees.
- Jason Bennett on behalf of Up for Thurston County denied that any person, including Kelsey Hulse or Paul Berendt, were officers of the committee, and in fact no person directed, authorized, or controlled expenditures.
- On 12/5/18, Up for Thurston County amended their C-1pc to list Jason Bennett as the sole officer, directing, authorizing, and controlling expenditures on behalf of the committee.
- Up for Thurston County also inadvertently left a box unchecked on their C-6s, disclosing independent expenditures in support of Linda Oosterman, and timely amended their report.

Based on these initial findings, staff has determined that in this instance, failure to accurately and completely disclose committee officers does not amount to an actual material violation warranting further investigation.

Up For Thurston County made minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of noncompliance, Up For Thurston County timely amended their reports, making the necessary technical corrections.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Up For Thurston County