

Complaint Description

Andrew Saturn (Wed, 13 Mar 2019 at 2:02 PM)

Jason Bennett, the sole person named as a committee member for Up for Thurston County PAC as well as the sole representative of Argo Strategies, has failed to provide the non-ministerial PAC committee member for a second time after receiving a formal written warning for previous filing inaccuracies.

The most recent C1PC for this PAC can be found here:

<https://web.pdc.wa.gov/rptimg/default.aspx?docid=4776396>

You will note that Jason Bennett again checked the box for "ministerial only," which is impossible: a PAC cannot have zero non-ministerial / executive committee members.

Jason Bennett refused to provide details of who arranged for the electioneering/advertising "mailer" sent in favor of Linda Oosterman in late October 2018 by Capitol City Press. In an email, Jason Bennett claimed he did not design or arrange for the mailer. However, Rodney Anderson of Capitol City Press, when asked to disclose who paid and arranged for the mailer, said Jason Bennett of Argo Strategies did. Both of these cannot be the case.

Jason Bennett is the only representative of Argo Strategies, a political consulting firm which touts on their website at argo.us:

"Argo Strategies is a full-service political consulting firm with more than 20 years of experience in campaigns. During the last eight years, our work has received national recognition – earning the firm sixteen Pollie Awards for our direct mail, websites and other voter contact by the American Association of Political Consultants. We have also been honored with two Reed Awards, eight Goldie Awards, and a "2011 Excellence Award," which named Argo the "Democratic Dream Team" for compliance."

With that in mind, I believe Jason Bennett, who has the experience and knowledge to file accurately with the PDC, is acting with malice to conceal details that should be made available in an attempt to deprive the public from information about an election. This is the second instance of failing to provide full disclosure about the sources of direction, funding, etc, in this PAC by its sole member, Jason Bennett.

This PAC received \$13,000 from Puget Sound Energy, a foreign-owned fossil fuel monopoly. This PAC also listed contributions from individuals who are known associates of Linda Oosterman, as well as listed Linda Oosterman's campaign manager, Danielle Westbrook, prominently on the mailer. In addition, this PAC listed in-kind contributions from Mr. Paul Berendt, a registered lobbyist for Puget Sound Energy. Also, it should be noted that Linda Oosterman benefitted from nearly \$9,000 in a nearly identical expenditure by Puget Sound Energy in 2012 (her previous

election). While these facts alone may not be sufficient evidence to prove illegal coordination between Linda Oosterman's campaign and this PAC (Puget Sound Energy), there are outstanding PDC complaints and other disclosure requests which I believe will provide such evidence.

Andrew Saturn (Wed, 13 Mar 2019 at 2:24 PM)

Please also attach this evidence

- The October 2018 mailer designed by Up for Thurston County PAC
- Capitol City Press (Rodney Anderson) disclosure attesting that Jason Bennett paid, and Paul Berendt provided the artwork (this was somehow not included in my previous complaint, #42554)

To clarify: half of my complaint is that if Jason Bennett claims to have made no decisions on behalf of the PAC (and filed illegally, with himself as the only member, but as a ministerial-only member), then that would make Paul Berendt the only other person who was making decisions, as Capitol City Press says Mr. Bennett and Mr. Berendt were the only two individuals to communicate on behalf of the PAC.

While Jason Bennett claims that Paul Berendt was a "vendor only," and should not be included as a member of the PAC, Mr. Bennett is attempting to have it both ways: he tells the PDC he's the only person involved, but tells me he had nothing to do with the PAC, and switched the PAC's C1PC back to "ministerial only" after his prior violation.

Andrew Saturn (Wed, 13 Mar 2019 at 4:29 PM)

Additional violation of RCW for this complaint: Jason Bennett, as the sole individual listed on the PAC, was not listed as such on the mailer and that is a very clear violation of 42.17A.320(2)(c):

"In addition to the information required ... all political advertising undertaken ... must include as part of the communication ... the full name of that individual ... if the sponsor is a political committee established, maintained, or controlled directly, or indirectly ... by an individual"

Andrew Saturn (Thu, 14 Mar 2019 at 2:06 PM)

Fox—

Please keep in mind, the context of the evidence I originally provided (attached as message #5) is that Mr. Bennett is claiming he had nothing to do with the mailer or any other decision making for Up for Thurston County PAC, and that's the extent of my complaint—that as the "ministerial-only treasurer" but only member of the PAC, the PAC had no controlling members, and was formed and operated illegally. My complaint is also that Mr. Bennett is attempting to conceal information

from the public by telling the PDC one thing, correcting his C1PC, and then later amending the C1PC and telling members of the public (me) something entirely different.

While it is my personal opinion that Argo Strategies and Mr. Bennett should be required to release commercial advertiser records since they literally provide electioneering and communications services to campaigns, I am no longer trying to request these records, and that's why these emails were left out. This issue is being taken up directly with the PDC.

As I stated in this complaint, both on the argo.us website and in his response to my first complaint (#42554), Mr. Bennett touts 20 years of experience with PDC compliance, and claimed that his "work ethic is to employ best-faith efforts to comply with any and all laws," and called my first complaint "baseless."

However, my first complaint (#42554) was not baseless—it resulted in the PDC requesting that Mr. Bennett correct numerous mistakes and omissions in the C1PC filed for Up for Thurston County, including adding "Sponsored by Puget Sound Energy," and adding missing contributions and expenditures, revealing that Mr. Bennett (acting as Up for Thurston County PAC) did in fact work with Mr. Paul Berendt, as I had originally alleged.

Mr. Bennett also admitted to the PDC that he was the sole controlling officer of Up for Thurston County PAC, and amended his C1PC to remove "ministerial only" from his treasurer statement. However, Mr. Bennett then again amended the C1PC in December 2018 to remove himself as the sole controlling officer before telling me in February 2019 that he had nothing to do with the decision making of the PAC.

Mr. Bennett is playing semantics and games with the PDC and this is a clear demonstration of *bad faith and malicious intent*, which is not a first for Mr. Bennett. The PDC website lists numerous formal complaints where Mr. Bennett, Argo Strategies, or PACs where Mr. Bennett is the respondent to very similar accusations.

Please see attached messages (numbered by the order they were sent/received), and include this message and its attachments in the official records for this complaint.

Thanks,

Andrew Saturn

What impact does the alleged violation(s) have on the public?

List of attached evidence or contact information where evidence may be found.

Up for Thurston County PAC's most recent C1PC filing
Jason Bennett email where he claims to have made no decisions for the PAC

List of potential witnesses with contact information to reach them.

Jason Bennett, Argo Strategies, jason@argo.us
Rodney Anderson, Capitol City Press, rodney@capitolcitypress.com

Complaint Certification:

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

Elect Linda Oosterman

For Thurston County PUD Commissioner, District 1

SOLID, STEADY LEADERSHIP

LINDA SUPPORTS:

- Safe and plentiful water at a reasonable price.
- Investing in a modern PUD infrastructure
- Quick, responsive and effective customer service
- A clean and sustainable environment
- Strong financial management of the PUD
- Implementing disaster preparedness plans



Thurston County Leaders endorse Linda Oosterman for her leadership and commitment to the job. Oosterman is endorsed by:

Karen Fraser, Former State Senator
Sam Hunt, State Senator
Beth Doglio, State Representative
Laurie Dolan, State Representative
Shawn Myers, State Representative
Jeff Gadman, Thurston County Treasurer

Steve Drew, Thurston County Assessor
Linda Enlow, Thurston County Clerk
John Tunheim, Thurston County Prosecutor
John Snaza, Thurston County Sheriff
Russ Olsen, Thurston County PUD Commissioner
Cheryl Selby, Mayor, City of Olympia

Andy Ryder, Mayor, City of Lacey
Pete Kinet, Mayor, City of Tumwater
Lisa Parishley, Olympia City Councilwoman
Jessica Bateman, Olympia City Councilwoman
Jim Cooper, Olympia City Councilman
Debbie Sullivan, Tumwater City Councilwoman

Tom Oliva, Tumwater City Councilman
Leatta Dahlhoff, Tumwater City Councilwoman
Cynthia Pratt, Deputy Mayor, City of Lacey
Michael Steadman, Lacey City Councilman
Liberty Ryder, Lacey Fire Commissioner
Bill McGregor, Port of Olympia, Commissioner

Also endorsed by: Women's Political Caucus of Washington, Thurston County Young Democrats, International Longshoremen's Union #47

Linda Oosterman

Active in our Community... A leader who gets results!

Linda Oosterman, a strong and effective leader!

- Linda's work in management, policy, and dispute resolution have been valuable in her first term with the PUD.
 - Oosterman has delivered on her commitment to clean and plentiful drinking water, cost-efficient service, and transparency on all PUD business.
 - She works for adequate and stable supplies of water, for both residents and businesses, as our communities grows.
- She leads with respect, listens intently to all sides, and encourages dialogue.
 - She is a leader who makes sure the PUD collaborates effectively with other public agencies and works to harmonize our need for a robust economy with our need for safe, clean water.

Vote for Linda Oosterman
Thurston County PUD Commissioner, Position #1

Paid for by Up for Thurston County 120 State Ave NE #174 Olympia WA 98501

No candidate authorized this ad. It is paid for by Up for Thurston County, 120 State Ave NE Suite 174, Olympia WA 98501.

Top Contributors: National Women's Political Caucus of WA Campaign Fund and Puget Sound Energy.

Other Contributors include Danielle Westbrook, Jennifer Belcher, Christine Garst, Susan Herring,

Katrina Wynkoop Simmons Sarah Segal and Captain Ralph Chappell, SC USN Ret.



Up for Thurston County
120 State Ave NE #174
Olympia WA 98501

PRSR STD
US POSTAGE
PAID
CAPITOL CITY
PRESS



Andrew Saturn <saturn@gmail.com>

Election records request, Oosterman, Up for Thurston County

Andrew Saturn <saturn@gmail.com>

Thu, Feb 7, 2019 at 9:20 PM

To: Jason Bennett <jason@argo.us>

Who produced the artwork, photos, text, etc? Did it appear from thin air between Argo paying for it and Capitol City Press printing it?

Capitol City Press's statement lists Argo Strategies. I'm looking for records per state law, not a debate on what the definition of "is" is.

Thanks,

Andrew Saturn



Andrew Saturn <saturn@gmail.com>

Election records request, Oosterman, Up for Thurston County

Jason Bennett <jason@argo.us>
To: Andrew Saturn <saturn@gmail.com>

Thu, Feb 7, 2019 at 9:30 PM

Yep, we were the treasurers so we paid the invoice. Our role was ministerial, so again, we didn't produce the mailer. Therefore, we can't help you with the specific requests related to that.



Jason Bennett
President, Argo Strategies



☎ 206-486-0085
☎ 206-718-8600
✉ jason@argo.us | 💬 Skype: argostrategies
🌐 www.argo.us
📍 PO Box 9100, Seattle, WA 98109

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Andrew Saturn <saturn@gmail.com>

Election records request, Oosterman, Up for Thurston County

Andrew Saturn <saturn@gmail.com>

Thu, Feb 7, 2019 at 9:34 PM

To: Jason Bennett <jason@argo.us>

So let me get this straight...

You work for Argo Strategies, which is a commercial advertiser subject to records disclosure laws for campaigns.

You also were the guy behind the PAC formed specifically for Linda Oosterman's campaign (and for this mailer).

The mailer was paid for by the PAC, using artwork that appeared out of thin air from Paul Berendt, who just happened to know to work with you on this, and mailed using a mailing list supplied by Argo.

So in your crazy mental gymnastics, you don't have to provide me with records because technically the PAC (which you created) and Paul Berendt (who just had spider sense and knew to show up with a check and artwork) are actually the people behind the mailer.

Would you say that's accurate?

Thanks,

Andrew Saturn

[Quoted text hidden]



Andrew Saturn <saturn@gmail.com>

Election records request, Oosterman, Up for Thurston County

Jason Bennett <jason@argo.us>
To: Andrew Saturn <saturn@gmail.com>

Thu, Feb 7, 2019 at 10:01 PM

What I am saying, and have said now in two emails and responses to two complaints, and what further continues to be unsatisfactory to you, for some reason...is that Argo Strategies was only treasurers on this campaign. Our role was strictly ministerial. The PDC has verified that in our earlier discussions on the C1PC, so I am not sure why we're still belaboring that point. We didn't design the mailer, we didnt print the mailer, we didnt mail the mailer. You have all of that info and why you continue to assume we had some larger role in the distribution of this one mailer is bewildering. We did give the voter list to Rodney, as I have stated, and I am happy to provide that to you.

Logging off for tonight but feel free to buzz me tomorrow if you have other questions.



Jason Bennett
President, Argo Strategies

  

 206-486-0085
 206-718-8600
 jason@argo.us |  Skype: argostrategies
 www.argo.us
 PO Box 9100, Seattle, WA 98109

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[Quoted text hidden]



Andrew Saturn <saturn@gmail.com>

Election records request, Oosterman, Up for Thurston County

Jason Bennett <jason@argo.us>
 To: Andrew Saturn <saturn@gmail.com>
 Cc: Argo Info <info@argo.us>

Thu, Feb 7, 2019 at 9:15 PM

Hi Andrew - my responses are below in red.



Jason Bennett
 President, Argo Strategies

206-486-0085
 206-718-8600
 jason@argo.us | Skype: argostrategies
 www.argo.us
 PO Box 9100, Seattle, WA 98109

[f](#) [in](#) [t](#)

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On Thu, Feb 7, 2019 at 7:41 PM Andrew Saturn <saturn@gmail.com> wrote:

To whom it may concern:

Per Washington State Law (WAC 390-18-050 and RCW 42.17A.345), your company is required to keep records and make them available **"within 24 hours"** to the public regarding media supplied for public election campaigns.

During the 2018 General Election, your organization produced mailers for Linda Oosterman, candidate for Public Utility District in Thurston County. These mailers were paid for by a PAC called "Up for Thurston County," which your organization also managed via Jason Bennett, and the mailers (according to a statement supplied to the PDC by Capitol City Press) were coordinated by Mr. Paul Berendt. The mailer also used a recent professional photo of a candidate, Linda Oosterman.

This is not accurate. Argo Strategies did not produce the mailers. We provided a voter list and inkinded that value to the campaign and provided compliance services to the campaign. We would not be considered "commercial advertisers" on this campaign as defined in WAC 390-18-050.

I am respectfully requesting the following records:

- Contracts, agreements, statements, records, ledgers, purchase orders, or other relevant records showing the "agreement" or "agreements" made to produce the mailer, including contracts or agreements for producing this mailer (or parts of this mailer) with any vendors or 3rd party individuals other than Jason Bennett

Again, we didn't produce the mailer so Argo would not possess these specific items.

- Some sort of purchase order or receipt for the photo used in the mailer (it was not itemized in the PDC reports issued by Up for Thurston County)

- A statement or explanation of why Mr. Paul Berendt, registered lobbyist for Puget Sound Energy, a major donor to Up for Thurston County PAC, was the person (according to Capitol City Press) who "delivered artwork" but is not listed as an officer or employee of Argo or Up for Thurston County PAC - was there an agreement in place here? Was Mr. Berendt contracted to deliver the artwork by Argo? There is no mention of this in the PDC reports as well

Sadly, we are not the right people to ask for this information as, you rightly note above, we did not design or print/mail the mailer. Paul Berendt is not an employee or officer of Argo. After discussions with the PDC, we amended the C1PC form per their advisement so it correctly and accurately reflected how they wished the C1PC form to look, including who should be listed as Up for Thurston County's officers.

3/14/2019

Gmail - Election records request, Oosterman, Up for Thurston County

I hope my request is clear and concise, but please let me know within 24 hours if it is not or if you have any issue meeting my request.

I am happy to show you the mailing list we pulled. But considering we were not the "commercial advertisers" for Up for Thurston County, there aren't any Argo invoices to show from us on production. We paid the Capitol City Press printing invoice when we received it and estimated it on the PDC report prior to receiving the actual invoice.

If you want to give me a buzz tomorrow, you can feel free to call me at 206.486.0085 and I am happy to talk to you and clarify anything that might remain unclear.

Thanks,

Andrew Saturn



INVOICE

CAPITOL CITY PRESS

2975 37th Ave SW • Tumwater, WA 98512
(360) 943-3556 • FAX: (360) 943-2140
A/R email • tabitha@capitolcitypress.com

INVOICE DATE 10/31/2018

INVOICE NUMBER 125278

CUSTOMER NUMBER 1522

UP FOR THURSTON COUNTY
120 STATE AVE NE #174
OLYMPIA, WA 98501

Remit to Address:
Capitol City Press Inc
2975 37th Ave SW
Tumwater, WA 98512

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PURCHASE ORDER NO.	ORDERED BY	JOB TICKET	SALESPERSON	TERMS
OOSTERMAN MAIL	JASON	Y63948	Rodney Anderson	Due Upon Receipt

DESCRIPTION

20,000 OOSTERMAN POSTCARD	1,747.48
MAILING SERVICES	1,030.00

Paul Barendt Supply Art -
ARCO STRATEGIES PAID POSTAGE

Sales Tax 247.20

TOTAL 3,024.68

Payment due on or before 11/7/2018

1 1/2% per month service charge on past due accounts.

Please Pay From This Invoice

Visit us at our website: www.capitolcitypress.com

