

Friends of Jimmy Matta
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November 22, 2017

VIA EMAIL

Fox Blackburn
Compliance Coordinator
Washington Public Disclosure Commission

Re: PDC - Matta, Jimmy (2): Alleged violation of RCW 42.17A.205 for failure to register a political committee, and RCW 42.17A.235-.240 for failure to accurately and timely report contributions and expenditures (EY 17; Nov 17)

Dear Mr. Blackburn:

I am writing in response to the complaint filed by Chestine Edgar on November 13, 2017. Thank you for the opportunity to respond.

1.) Alleged Violation of RCW 42.17A.205 for failure to register political committee in support of Nancy Tosta, Krystal Marx, Jimmy Matta, and Pedro Olguin.

This allegation is a bit confusing and jumbled, but I will do my best to respond. Ms. Edgar doesn't really cite anything specific regarding this allegation, just that she believes that the campaigns were pooling money together. The campaigns never actually formed a PAC like organization or pooled any of their donations or money together. Costs for any shared space or services have been split equally between the campaigns, and the Friends of Jimmy Matta campaign only ever collected donations that were made specifically to the campaign. Ms. Edgar also references political party support as evidence of "PAC like behavior". However, while the races themselves may be non-partisan, that doesn't preclude political parties from supporting the candidates. This allegation appears to be based entirely on speculation. If there is any specific evidence or instances that the PDC would like more information on I will be happy to provide it.

2.) Alleged Violation of RCW 42.17A.240 and WAC 390-16-037 for failure to provide detailed breakdowns of expenditures for GOTV campaigns and services expenditures.

I believe that the campaign has reported everything we are required to thus far. Any expenses made after the 7 Day C4 reporting period don't need to be reported until the next C4 reporting

deadline on December 11th. All of the expenses or debts in question that incurred before the 7 Day or 21 day C4 reporting periods appeared in the corresponding report. I have provided detailed responses to all specific expenses or debts that Ms. Edgar has cited below.

3.) Alleged Violation of RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately report proportional share of shared rental spaces.

Payment for the rental space appears as an expense on Friends of Jimmy Matta's 7 day C4 report. The expense was incurred on 10/27/2017 and reimbursements were received on 11/3/2017 (Marx & Tosta Campaigns) and 11/5/2017 (Olguin Campaign) and will be reported as other receipts. My campaign Treasurer, Garrett Havens, spoke with PDC Compliance Specialist, Chip Beatty on October 30th about how to properly report the expense and reimbursements for this and the campaign has followed his direction. One thing to note here is that the Krystal Marx campaign did overpay on her reimbursement for her campaign's portion of costs related to this expense, which may be the cause of some of the confusion. The reimbursements for this will appear on the next C4 report due on December 11th.

4.) Alleged Violation of RCW 42.17A.235 for failure to timely report expenditures for "Fantastic Four" mailer.

5.) Alleged Violation of RCW 42.17A.235 for failure to timely report postage and/or distribution expenditures for "Fantastic Four" mailer.

The fourth and fifth allegations regarding the "Fantastic Four Mailer" originally appeared as a debt for "printing and mail service for 2500 lit pieces" on the campaign's 21 day C4 report. At the time, there was a serious discussion about mailing some of them out, so our campaign listed "mail service" just to be safe and avoid potential disclosure violations. Ultimately, it was decided that the Fantastic Four flyers would not be mailed out, but instead were just used for doorbelling purposes. The flyers were originally printed to be used for a 9/30/2017 doorbelling event and the campaign was notified of its portion of the cost on 10/5/2017. Understandably, this has caused some confusion for Mr. Edgar. However, the debt was reported in a timely manner (21-day C4 report) and over reporting a debt that the campaign ultimately did not incur should demonstrate the campaign's commitment to transparency and desire to provide fully detailed reports to the public. The campaign will amend the 21 and 7 day C4 reports to accurately show that the cost was only for printing services.

6.) Alleged Violation of RCW 42.17A.235 for failure to timely report in-kind contributions or expenditures for political advertising sponsored by the Washington State Democratic Party.

All in-kind contributions from the Washington State Democratic Party occurred after the 7 day reporting period. My campaign received notification on 11/6/2017 of two in-kind contributions made by the State Democratic Party. The first was for staff time amounting to \$12.76 on 11/4/2017. The second was for GOTV Texting service amounting to \$49.56 on 11/5/2017. Both

in-kind contributions will be reported in a timely manner on the campaign's December 11th C4 report.

It has always been and continues to be my goal to file accurate and timely reports with the PDC. I trust that I have satisfied your request and would make myself available to provide more information.

Sincerely,

Jimmy Matta