



**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

May 21, 2019

Delivered electronically to "mark@northcreeklaw.com"

Subject: Complaint filed by Jennifer Robertson, PDC Case 48311

Dear Jennifer Robertson:

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

As noted in the letter to Edward Horejs, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to accurately and completely disclose expenditure details, including the number of items and sub-vendors actually providing the goods and services for the campaign. Staff expects you to provide detailed descriptions of expenditure details on all future required reports. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director



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May 21, 2019

Delivered electronically to "ehorejs3@gmail.com"

Subject: Complaint regarding Jennifer Robertson, PDC Case 48311

Dear Edward Horejs:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 5, 2019. The complaint alleged that Jennifer Robertson, a 2015 candidate for Bellevue City Council may have violated RCW 42.17A.240 for failure to accurately and completely disclose in-kind contributions and debts on Summary Full Campaign Contribution and Expenditure reports (C-4 reports), and WAC 390-16-037 and WAC 390-16-205 for failure to accurately disclose sub-vendor breakdowns for expenditures undertaken by the campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Jennifer Robertson; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- Jennifer Robertson made four expenditures for mailed political advertising in the 2015 election campaign, which failed to provide the number of items printed, and failed to disclose sub-vendors contracted by Meridian Pacific for the printing and mailing, as required by RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205.
- Jennifer Robertson also reported an expenditure of \$15,000 to Meridian Pacific for "Consulting" and failed to provide sufficient detail as to the nature of this expenditure.
- The complaint alleged that this expenditure was a payment to Comcast for television advertising, which the response qualified as an exemption to their generally correct reporting, stating "[t]he only possible exception is one media expense that was inclusively invoiced as consulting and reported as the same."
- Meridian Pacific asserted that in accordance with California State Law, where they are located, sub-vendor breakdowns were provided on invoices to the campaign at the time of billing, and again in the course of this case to facilitate amendments to Jennifer Robertson's reports.
- Jennifer Robertson failed to amend the 2015 campaign's reports as requested by PDC staff, and provided no response as to why additional disclosure was not required.
- Jennifer Robertson's response to the allegedly unreported debts was that too much time had passed to reconstruct orders placed prior to invoicing, and that Lori Creek's payment for treasurer services was a discretionary payment not committed to in any prior reporting period.

Based on our findings staff has determined that, in this instance, failure to accurately and completely break down expenditure details does not amount to a violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(d), Jennifer Robertson will receive a formal written warning concerning failure to accurately and completely disclose expenditure details, including the number of items and sub-vendors actually providing the goods and services for the campaign. The formal written warning will include staff's expectation that Jennifer Robertson provides detailed descriptions of expenditure details on all future required reports. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

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 fdc@fdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director

cc: Jennifer Robertson