



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

September 9, 2019

Delivered electronically to "oostermanlinda@gmail.com" and "shawneemyers@comcast.net"

Subject: PDC Case 54856

Dear Linda Oosterman:

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

As noted below to Andrew Saturn, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and 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 Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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



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September 9, 2019

Delivered electronically to "saturn@gmail.com"

Subject: Complaint regarding Linda Oosterman, PDC Case 54856

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 13, 2019. Your complaint alleged that Linda Oosterman (the "Respondent") may have violated RCW 42.17A.235 & .240 by not timely & accurately reporting in-kind contributions, expenditures & proceeds from a Champagne Brunch held in 2018. Specifically, you alleged that the Respondent failed to 1) report fundraising income (contributions) from the event; 2) report expenditures for the venue and banquet permit; and 3) adequately describe the brunch expenditures reported on the campaign's August and October, 2018 C-4 reports.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; and the applicable PDC reports filed by Respondent to determine whether the record supports a finding of one or more violations.

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

- The Respondent was an incumbent candidate for reelection as Thurston County PUD Commissioner in election year 2018, having served in this position since 2012.
- RCW 42.17A.235 and .240 require each candidate to file periodic reports disclosing the value of "all contributions received and expenditures made" by the campaign during the reporting periods set forth in .235 & .240. Exception: A campaign that qualifies for, and has selected on its candidate registration, the "mini reporting option" is relieved of reporting requirements under .235 & .240.
- A "contribution" includes, but is not limited to, "a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, transfer of funds, or anything of value, including personal and professional services for less than full consideration." RCW 42.17A.005(15)(a), as revised
- An "expenditure" includes, but is not limited to, a "payment, contribution, subscription, distribution, loan, advance, deposit, or gift of money or anything of value, and includes a contract, promise, or agreement...to make an expenditure." Expenditure also includes a promise to pay, a payment, or a transfer of anything of value in exchange for goods, services, property, facilities or anything of

value for the purpose of assisting, benefiting, or honoring any public official or candidate, or assisting in furthering or opposing any election campaign.” RCW 42.17A.005(22), as revised

- On August 19, 2018, a Champagne Brunch was held to benefit the Respondent.
 - The brunch was held at the private residence of the Respondent’s campaign Treasurer, Shawn Myers. As such there was no cost associated with the venue to report and a banquet permit was not required.
 - Thurston County Auditor, Mary Hall, and Retired State Senator Karen Fraser were listed as event “sponsors” as a show of support only and did not incur any costs or make any in-kind contributions for the brunch.
 - Shawn Myers purchased all the food and beverages for the brunch and this \$150.40 expenditure was timely reported as an in-kind contribution to the Respondent’s campaign on its August C-4 report (report 100858295 and amended report 100901756). No other supplies were donated for the brunch.
 - Contributions from the brunch event were received by the campaign’s Treasurer on August 25, 2018 and were timely deposited and reported to the PDC on C-3 reports (reports #100854134 and 100854632).
 - The details reported for the \$150.40 in-kind contribution from Shawn Myers on the campaign’s August C-4 include the date of receipt (8/18/18) - which is the date of the brunch - and the description “Fundraiser.” The level of detail provided for this in-kind contribution meets the requirements of RCW 42.17A.240.
- The Respondent indicated that the photo and video provided by the Complainant as evidence of a “sizable venue” were taken at the Thurston County Democrats election night party on November 6, 2018 and are unrelated to the Champagne Brunch.

Based on these findings, staff has determined that, in this instance, no evidence supports a finding of a violation warranting further investigation.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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Barbara Sandahl
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cc: Linda Oosterman