

LAW OFFICES
Trister, Ross, Schadler & Gold, PLLC

1666 CONNECTICUT AVENUE, N.W., FIFTH FLOOR

WASHINGTON, D.C. 20009

PHONE: (202) 328-1666

FAX: (202) 204-5946

www.tristerross.com

MICHAEL B. TRISTER
(1941-2018)

GAIL E. ROSS
B. HOLLY SCHADLER
LAURENCE E. GOLD
ALLEN H. MATTISON†
DAVID M. WACHTEL*
KAREN A. POST

†ALSO ADMITTED IN MARYLAND

*ALSO ADMITTED IN
CALIFORNIA AND MARYLAND

JESSICA ROBINSON†
Of Counsel

KATHY S. STROM+
Of Counsel
+ALSO ADMITTED IN
NEW YORK AND MARYLAND

JOSEPH W. STEINBERG‡
‡ALSO ADMITTED IN MINNESOTA

SARAH E. NASON*
JOHN O. SAWYKO*
*ALSO ADMITTED IN NEW YORK

Montana Office
LAURA L. HOEHN°
Of Counsel
°ALSO ADMITTED IN CALIFORNIA

August 27, 2019

By email to pdcc@pdcc.wa.gov

Fox Blackhorn
Public Disclosure Commission
105 Capital Way, Suite 206
Olympia, WA 98533

Re: UNITE HERE Response to Complaint 55344

Dear Mx. Blackhorn:

On behalf of UNITE HERE, this responds to the above-referenced complaint filed with the Public Disclosure Commission (the "Commission") by Tallman Trask on July 23, 2019 (the "Complaint"). The Complaint refers to certain digital ads and avers that, in the event that UNITE HERE paid for those ads, UNITE HERE violated RCW sections 42.17A.320 and 42.17A.250.¹ In fact, UNITE HERE did not pay for the digital ads in question. Rather, those digital ads were paid for by UNITE HERE! Local 8 PAC. [See UNITE HERE! Local 8 PAC Response to Complaint 55345](#). Thus, UNITE HERE did not violate Washington law as alleged in the Complaint, and the Commission should dismiss the Complaint in full.

Please contact me if you require additional information.

Respectfully submitted,



Jessica Robinson

¹ The Complaint also asserts that if UNITE HERE! Local 8 PAC made contributions to UNITE HERE, UNITE HERE! Local 8 PAC may have violated RCW section 42.17A.235. However, UNITE HERE! Local 8 PAC did not make contributions to UNITE HERE. [See UNITE HERE! Local 8 PAC Response to Complaint 55345](#), which we fully incorporate herein by reference.