



**SUMMIT**  
LAW GROUP

*a professional limited liability company*

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October 9, 2019

*Via Email ([pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)) and U.S. Mail*

Phil Stutzman  
Compliance Officer  
Public Disclosure Commission  
711 Capitol Way S. #206  
PO Box 40908  
Olympia, WA 98504

**Re: Waste Treatment Completion Company (WTCC)  
PDC Case No. 55698**

Dear Mr. Stutzman:

In response to the Freedom Foundation's Complaint Supplement, Waste Treatment Completion Company responds as follows:

1. Allegation 1: Failure to Permit Inspection of Employee Deduction Authorization Forms. As set forth in WTCC's September 20, 2019 response, WTCC adamantly denies this allegation. WTCC made arrangements for Mr. Nelson's visit and prepared the annual notification forms for his review. When he arrived, he stated that he was not interested in reviewing these forms but rather wanted to review the individual deduction forms. Therefore, WTCC assigned personnel to assist him in retrieving the forms from the personnel files of those Mr. Nelson identified at the time of his visit. He was invited to return the following day to complete his review but chose not to do so. As set forth in WTCC's initial response, there has been no violation.

2. Allegation 2: Deduction of Authorization without Proper Authorization. The Freedom Foundation appears to take issue with the fact that there are older versions of the authorization forms in some employees' personnel files. However, there is no dispute that (1) all employees received and signed the annual notification provided by Local 598 and approved by the Commission earlier this year, (2) WTCC has consistently used the approved deduction authorization form for all employees dispatched since March 2019, and (3) there is no evidence of an improper deduction having been made. WTCC has every interest in fully complying with the law. It believes it has performed its responsibilities in good faith and as directed. If there are additional steps necessary to ensure compliance, WTCC is more than willing to take those steps. However, at this time, it is unclear what, if anything, more is required.

Phil Stutzman  
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Please do not hesitate to contact me if there are additional questions.

Sincerely,

SUMMIT LAW GROUP, PLLC

A handwritten signature in black ink, appearing to read "ER Kennar", with a long horizontal flourish extending to the right.

Elizabeth R. Kennar