



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

September 12, 2019

Delivered electronically to "peopleforseattle@gmail.com"

Subject: Complaint filed by Andrew Saturn, PDC Case 55701

Dear People for Seattle:

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

As noted in the letter to Andrew Saturn, 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.

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 [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director



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September 12, 2019

Delivered electronically to "saturn@gmail.com"

Subject: Complaint regarding People for Seattle, PDC Case 55701

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 27, 2019. The complaint alleged that People for Seattle (Respondent), a continuing political committee, may have violated RCW 42.17A.240 for failure to disclose the value of expenditures or in-kind contributions for mailing lists on Summary Full Campaign Contribution and Expenditure reports (C-4 reports); and RCW 42.17A.260 for failure to disclose independent expenditures for political advertising appearing within 21 days of an election on Independent Expenditure and Electioneering Communications reports (C-6 reports).

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; 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:

- The Respondent sent an email on July 20, 2019, soliciting contributions and financial support for the political committee itself, but did not solicit votes or financial support for any candidate or ballot proposition in that email.
- As this email neither mentioned nor solicited votes or financial support or opposition to particular candidates, it was neither an independent expenditure for political advertising as contemplated by RCW 42.17A.260, nor an electioneering communication as contemplated by RCW 42.17A.305.
- The value of this email was reported as a debt to Dewey Square Group for digital communications and consulting on the C-4 reports filed July 14 and July 29, 2019, as required by RCW 42.17A.240(8), which concerns the accurate and complete disclosure of debts and obligations.
- WAC 390-16-205 requires expenditures made on behalf of candidates and political committees through sub-vendors and third parties, to be reported in accordance with WAC 390-16-037 as though made or incurred by the candidate or committee directly.
- WAC 390-16-037 requires detailed descriptions of expenditures in accordance with RCW 42.17A.240(6), which concerns the accurate and complete disclosure of expenditures paid by the campaign.

- The Respondent properly reported debts to Dewey Square Group in accordance with RCW 42.17A.240(8), and will be required to disclose sub-vendors utilized to acquire mailing lists, along with the value attributable to these lists, once the debt is discharged in accordance with RCW 42.17A.240(6), WAC 390-16-037, and WAC 390-16-205.

Based on our findings staff has determined that, in this instance, no evidence supports a finding of a violation that warrants 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s

Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: People for Seattle