

December 27, 2019

Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to respond to Helen Wheatley’s complaint (#61735) filed on December 21<sup>st</sup>, 2019.

The definition of “officer” exists in WAC 390-05-245 and is broadly defined as:

*“Any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee.”*

Additionally, the required items for the filing of the C1PC form can be found in RCW 42.17A.205 (2)(c)(j). Specifically, it reads:

*“(2) The statement of organization shall include but not be limited to:*

- c) The names, addresses, and titles of its officers; or if it has no officers, the names, addresses, and titles of its responsible leaders;*
- (j) The name, address, and title of any person who authorizes expenditures or makes decisions on behalf of the candidate or committee;”*

Since not every PAC has a clear hierarchy of decision-making or clear set of officers, a treasurer must rely on these broadly defined references that do exist and also on the previous advice from PDC staff.

In several discussions recently with the Public Disclosure Commission’s staff, it has been advised that officers might include a person who directs the creation of the PAC and/or hire on treasurer staff could also be broadly-defined as a strategic decision maker on behalf of the committee (email from Mx Fox Blackhorn, PDC Compliance Coordinator 2, to Jason Bennett on 3/15/19). That person in both instances is Dean Nielsen, who is listed on our C1PC. No other person meets the definitions above nor fits the additional clarity the PDC staff have provided. Therefore, this complaint has no merit and we kindly ask that it be dismissed.

Thank you for your time and attention to this matter.

Sincerely,

Jason Bennett, Treasurer  
People for Thurston County Jobs

Dean Nielsen, Consultant  
People for Thurston County Jobs