

Lund.jami (Thu, 9 Jan 2020 at 8:26 PM)

to: "PDC Support" pdc@pdc.wa.gov

Hi Tabitha,

Thank you for your patience.

Attached is my formal response to the complaint for the Commissions consideration.

As indicated in my letter, I have also amended reports to add the level of detail suggested.

I would be happy to meet with you to discuss any elements which I may have missed or misunderstood. Please let me know if there is anything else I can do to bring this issue to a conclusion.

Jami Lund
(360) 918-3990

Jami Lund
160 Wakefield Dr
Centralia, WA 98531

January 9, 2020

Tabitha Townsend
Compliance Coordinator
Washington Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

RE: **PDC Case Number 61764** Peter Starzynski Alleged Violation of 42.17A.240 for failure to accurately disclose contributions and expenditures on C-3 and C-4 reports (EY 19, Dec 19)

Tabitha:

Thank you for the chance to respond to the allegations regarding the level of detail on reports filed for my 2019 campaign for school board. I believe in transparency, and would like to note that this campaign filed 29 reports which were doubtless combed by Mr. Starzynski to find violations.

The eleven items he identifies as needing slightly more detail, compared to the sixty pages of reports filed in this campaign, certainly do not indicate bad faith or any attempt to deprive the public of critical information. All were timely filed and included information necessary for the public to understand expenditures or transactions.

However, in the complaint Mr. Starsinki of Portland Oregon has identified eleven items which he believes rise to the level of violations.

One: Tumwater Printing quantity of mail items. I was unaware that printing counts were required since they rarely match what is mailed, and the ORCA software offered no fields or prompts asking for this information. My later review of the PDC guidance indicates that "count" is expected for printing, and the C4 form has been amended to include the number of printed items that my reported expenditure of \$873.83 provides.

Two: Apex Mailing quantity of mail items. I was unable to find any guidance in the PDC "Expenditures and Debts" document (<https://www.pdc.wa.gov/learn/publications/political-committee-instructions/expenditures-debts/expenditures-require>) which describes what to put in the description box of the ORCAS software, nor does the software itself provide prompts. Nonetheless, this item has been updated and an amended report filed.

Three: IRC Print & Design quantity. As above, the expenditure amount and item was reported without realizing that the counts were expected. The reports now include this information.

Four: Mailbox of Olympia quantity. As above, no guidance was found on mailhouse expenditure descriptions, but the reports include this information.

Five: US Post Office Quantity. This expenditure was for stamps and elements for individualized correspondence, and is not the same thing as a printing and does not have a "count" for how many printed items.

Six: Loan from Jami Lund to Jami Lund Campaign information about the lender. Since the candidate files an F1 form and a C1 form, the contact information and other details of "Jami Lund" are in the set of campaign records. The ORCA software gives no ability to supply the level of detail described in the complaint. However, supplying the "repayment schedule" of "As fund become available" should make moot the "interest rate" and "due date." In fact attempting to put a zero or "not applicable" in these fields is not allowed.

Amount	Date	Account
\$208.47	11/30/2...	Bank Accounts

Seven: Voter Science details. Voter Science does not put its address on the website which I used to secure a canvassing application. I have subsequently searched the state corporations directory to discover the address, but finding how to edit this on ORCA evaded me. The information has now been updated in my reports.

Eight: Refund of donation of William & Vicky Brumfield. Using ORCA software, I entered the required information about the refund of their attempted November 4th donation. The way this was presented by the software when using the "refund donation" option shows the user the details of the donation and the refund, but on the C4 form those elements were omitted by the ORCA software.

Amount	Date	Check No. (optional)
\$500.00	11/30/2019	

I have modified the entry to indicate the fact that this is a refund when presented on the C4 form.

Nine: Details regarding what "copies" means. It is unclear why a small expenditure of \$64.60 for copies needs further clarification, but the form has been updated to attempt greater clarity.

Ten: Broadcast and print advertising dates. The requirement for the date of publication as well as the date of purchase was unknown to me, and nothing in the ORCA software suggests such a requirement or provides a place to enter a second date. Nonetheless, the start date – which is the same as the payment date – has been added to the report.

Eleven: Six donations missing some element of the donor's information. I lacked access to the complete information due to the unexpected nature of the donations. I had my web-based donations page done inexpensively assuming nobody would use it without first being invited to do so in my communication.

When the online publication, *Shift WA*, covered the extraordinary nature of unions spending \$90,000 on a school board race, they also invited people to donate (an activity reported as an "in kind" contribution). Scores of people donated, but didn't provide all the reportable information. I repeatedly contacted and sought the missing addresses, and ultimately had all but a few. I have again worked on supplying the information and the C3 report is modified to include the information found.

Since these appear to be technical corrections, which have been remedied, I would ask the Public Disclosure Commission Director accept the amended reports and to close the complaint without further action.

If you have questions, or to request additional information please do not hesitate to call me at (360) 918-3990.



Jami Lund