

Philip Lloyd (Thu, 30 Apr 2020 at 10:21 AM)
to: "PDC Support" pdc@pdc.wa.gov

Thank you for sending this.

We do not see any actual violations in the complaint.

Please contact us if there is some element of non-compliance that we may have missed from our review of the complaint.

Philip Lloyd (Wed, 20 May 2020 at 1:17 PM)
to: "PDC Support" pdc@pdc.wa.gov

Hello Tabitha – Thank you for sending that information. We have reviewed your spreadsheet and found nine individuals with missing occupation and employer information. We have amended all of the c3s to correct these omissions. And it should be noted that for seven of these people their occupation and employer was reported on subsequent c3 reports, so the information was available. We believe that there were some duplicate donor records that were originally under \$100 in the aggregate but were subsequently merged. We apologize for any inconvenience that this may have caused.

Please see the attached spreadsheet with our notes. The occupation/employer information is not disclosed on reports until a contributor's aggregate exceeds \$100 so that's why there are so many blank occupation/employer fields. Also there are some donors with the same name that we confirmed are not the same individual.

By our experience, 'Not Employed' is a standard and accurate way to report an individual who isn't employed. We collect all required donor data and report that information in the manner it is given. If a donor fills out an online form or paper remit and lists their occupation as 'not employed,' that is how we report it. Our main credit card processor is ActBlue, the largest processor of online contributions for democratic candidates nationally. On its donate pages there is a question "Are you currently employed?" if a person selects yes they are asked for their occupation, employer, and address of employer, but if a person selects no then None/Not Employed is automatically entered in. That information is imported into our PDC filing system. We don't see anything specific in WAC 390-16-034 that this would not fulfill the disclosure requirement, though we would appreciate additional guidance on this matter.

Please let me know if you have any additional questions.

Philip Lloyd, Treasurer
Jay Inslee for Washington