



August 17, 2020

Tabatha Blacksmith
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

RE: PDC Case No. 754473, Vaska for AG

VIA EMAIL ONLY

Dear Ms. Blacksmith:

I am replying on behalf of my client, Vaska for AG (the Committee) to your email of August 3, 2020, requesting a response to a complaint filed with the Public Disclosure Commission (PDC), alleging violations of RCW 42.17A.235 and .240.

Disclosure of Television Advertising

The complaint alleges that television advertising began running on July 13, 2020 and should have been disclosed on the 21-day Pre-Primary C4 due on July 14, 2020. The complaint includes an "Order Contract" with Comcast that shows a run date of July 13, 2020.

Television order contracts with Comcast are booked with a Sunday to Monday run date regardless of the date the advertising is actually ordered, paid, and/or begins. In fact, in the detail below the summary included it is clear that no advertising ran before July 15, 2020.

While the Committee entered into discussions during the second week of July with Comcast regarding television advertising, the Committee did not place a final order with Comcast until July 14, 2020, and the advertising did not begin until July 15, 2020. Accordingly, the Comcast advertising was dutifully disclosed on the 7-day Pre-Primary C4 due and filed on July 28, 2020. The Order Contract was clearly available to the complainant as the advertising began to run.

An amended 21-day Pre-Primary C4 Schedule B has been filed disclosing television/video production costs for that advertising as itemized here:

1. July 7, 2020; Sermo Digital; Epicenter films: Video production; \$2,500.00.
2. July 11, 2020; Sermo Digital; Video editing; \$1,250.00
3. July 11, 2020; Sermo Digital; Shutterstock: Stock footage; \$170.66
4. July 11, 2020; Sermo Digital; Debbie Grattan: Voiceovers; \$362.25

Mailing Disclosure

The complaint suggests an election mailer did not disclose the number of pieces mailed and was not disclosed properly. The mailer in question was disclosed on the 7-day, Pre-Primary C4 No. 100987843 as follows:

1. Schedule A; July 14, 2020; Sermo Digital; Fundraising mail postage; \$22,210.97
2. Schedule B; July 14, 2020; Sermo Digital; Mail pieces (285691) - Estimate; \$26,287.89

The Committee has since received more accurate billing information regarding this mailing. The printing estimate (described as "Mail pieces" in item #2 above) has been updated and moved to the amended 21-day Pre-Primary C4 Schedule B referenced earlier as follows:

- July 10, 2020; Sermo Digital; Print NW: Mail pieces (164754) – Estimate; \$27,000.00.

The postage expense properly remains on the 7-day, Pre-Primary C4 and has been updated as follows:

- July 14, 2020; Sermo Digital; Mail piece postage; \$21,463.60.

I hope you find this information useful. Please contact me if I can provide further information.

Sincerely,



Dan Brady