



**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 • Website: www.pdcc.wa.gov

December 24, 2020

Delivered electronically to Brent Ludeman on behalf of Pierce County Job Creators for Economic Recovery at "brent.ludeman@gmail.com"

Subject: Complaint filed by Janet G. Thiessen, PDC Case 78841

Dear Mr. Ludeman:

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

As noted in the letter to Janet Thiessen, 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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December 24, 2020

Delivered electronically to Janet G. Thiessen at “janetthiessen39@hotmail.com”

Subject: Complaint regarding Pierce County Job Creators for Economic Recovery, PDC Case 78841

Dear Janet Thiessen:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 15, 2020. The complaint alleged that Pierce County Job Creators for Economic Recovery, a single year political committee registered and reporting campaign activities, including independent expenditures supporting local 2020 candidates, may have violated RCW 42.17A.260 for failure to timely and accurately report independent expenditures or RCW 42.17A.305 for failure to timely and accurately report electioneering communications within twenty-four (24) hours of presentation to the public.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by committee Director and Treasurer, Brent Ludeman on behalf of Pierce County Job Creators for Economic Recovery (the “Respondent”); the applicable PDC reports filed by the 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:

- On September 24, 2020, Pierce County Job Creators for Economic Recovery submitted a Political Committee Registration Statement (C-1pc report), choosing the “Full Reporting” option and listing Brent Ludeman as Director and Treasurer.
- RCW 42.17A.260 requires a sponsor of an independent expenditure advertisement to disclose this activity within 24 hours of, or on the first working day after, the date the ad is first published, mailed, or otherwise presented to the public, if the political advertising meets specific criteria identified in statute. RCW 42.17A.260 goes on to list the specific details required on the special report, including but not limited to, the name of the candidate supported or opposed by the expenditure, the office being sought by the candidate, and whether the expenditure supports or opposes the candidate long with the amount spent to support or oppose the candidate.
- As a registered political committee, the Respondent was required to submit Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign. In addition, as a sponsor of Independent Expenditure advertisements, the Respondent was required to submit Independent Expenditure (IE) reports (C-6 reports) disclosing details about the IEs as described in RCW 42.17A.260.

- The complaint alleged that the Respondent produced and distributed a written advertisement that supported Jason Whalen and opposed Jani Hitchen, both candidates for Pierce County Council in the November 3, 2020 general election and that the C-6 report was filed late and was inaccurate by failing to disclose the ad’s opposition to Ms. Hitchen.
- In his response, Mr. Ludeman stated that the purpose of the mailer was to support Jason Whalen and that the ad did not mention Mr. Whalen’s opponent, Jani Hitchen. In addition, Mr. Ludeman stated that he believed Pierce County Job Creators for Economic Recovery reported the expenditure accurately by submitting the required C-6 report on October 15, 2020, within 24 hours of the advertisement’s distribution and prior to the complaint.

Based on staff’s review of the documentation submitted with the complaint, the written response provided, and the reports submitted by the Pierce County Job Creators for Economic Recovery, no evidence was found to show that the Respondent sponsored written political advertisement to specifically oppose 2020 Pierce County Council candidate Jani Hitchen, or that the C-6 report disclosing the expenditure was inaccurate or filed late.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Brent Ludeman for Pierce County Job Creators for Economic Recovery