



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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April 1, 2015

(Sent by E-mail to paul.lawrence@pacificallawgroup.com and by U.S. Mail)

PAUL LAWRENCE
1191 2ND AVE STE 2100
SEATTLE WA 98101-2945

Subject: Complaint concerning Argo Strategies and Jason Bennett; Michael King; and The Roosevelt Fund: PDC Case No. 14-014

Dear Mr. Lawrence:

The Public Disclosure Commission (PDC) has completed its investigation of the complaint you filed on October 11, 2013, against the Roosevelt Fund; ARGO Strategies (ARGO) and Jason Bennett as treasurer for the Roosevelt Fund; and Michael King as Executive Director of the Roosevelt Fund, alleging violations of RCW 42.17A by the Roosevelt Fund for inaccurate reporting of \$36,000 in expenditures, and possible additional violations of RCW 42.17A by Mr. Bennett and Mr. King for alleged personal use of campaign funds and concealment of expenditures.

Your complaint was considered in light of the following statutes:

RCW 42.17A.220, .235, and .240 requires treasurers of political committees to file timely, accurate reports of contribution and expenditure activities.

RCW 42.17A.435 states that no contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.

RCW 42.17A.445 states that campaign contributions reportable under RCW 42.17A.220 through 42.17A.240 may only be paid to an individual for services performed for a political committee, reimbursement of wages lost due to campaigning, reimbursement of direct out-of-pocket campaign-related expenses, or repayment of monetary loans to the committee.

PDC staff reviewed your October 11, 2013 letter, which PDC staff treated as a formal complaint; campaign finance reports and other documentation submitted by the Senate Democratic Campaign Committee (SDCC) and the Roosevelt Fund; results of PDC database queries for expenditures reported by the SDCC and the Roosevelt Fund; written responses to the allegations received from Jason Bennett; and information received from Maureen Judge. As a result of our investigation, we found the following:

ARGO Work on PAC Workbook / Database Project

- Through his campaign compliance firm, ARGO Strategies, Mr. Bennett served as treasurer for both the SDCC and the Roosevelt Fund until March 1, 2013. During all of 2012 and a portion of 2013, Michael King served as the Executive Director for both the SDCC and the Roosevelt Fund.
- Mr. Bennett and ARGO entered into a verbal agreement with the SDCC to complete an online database project, known as a "PAC workbook." Prior to conducting work on the project, ARGO reviewed the scope of the project to determine how to turn a database of contribution information into a user-friendly, searchable online workbook. The Roosevelt Fund had nearly 1 gigabyte of campaign finance data going back a number of election cycles, and ARGO staff members expressed concerns that the work would likely be time consuming and costly to complete during calendar year 2012. Accordingly, Mr. King and ARGO agreed that work on the database project would be completed in smaller phases over multiple election cycles.
- The database project was not part of the PDC's Online Reporting of Campaign Activity software (ORCA). Rather, it was a Microsoft Access database coupled with links to webpages that allowed the user to search the database. The database used imported lists, organized and linked lobbyist information to contributors, and presented these data in a way that candidates and other users could easily search, find, and understand the information.
- Communications between Mr. Bennett and SDCC's Finance Director in January of 2012 indicate that committee officials were aware of the "PAC workbook" project. Mr. Bennett stated he believed that the SDCC co-chairs and the Roosevelt Fund board were aware of his work on the database project. He stated that neither Mr. King nor other SDCC employees took any action to suggest that they did not have the authority to approve expenditures for the project.
- Mr. Bennett understood that prior to October 11, 2013, the date of your complaint, work product related to the database project was included in the SDCC and Roosevelt Fund records that were seized during a criminal investigation of Michael King. He stated that a backup copy of the database project was provided to SDCC attorneys and the Roosevelt Fund shortly after it was requested in 2013.

Maureen Judge Work for ARGO Strategies

- Maureen Judge was a candidate for State Senator in the 41st Legislative District in 2012. ARGO provided campaign consulting and disclosure services for Ms. Judge's 2012 Senate campaign. In addition, during calendar year 2012, Ms. Judge worked as an independent contractor for ARGO.
- ARGO paid \$38,500 to Ms. Judge to create a marketing plan, design and create marketing materials, assist ARGO with its website, and to revamp ARGO's branding and image. The payments ARGO made to Ms. Judge were for work she performed for ARGO.

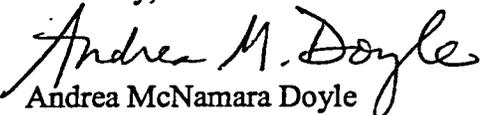
- Ms. Judge only provided work for ARGO, not for ARGO's clients, including the SDCC or the Roosevelt Fund. Ms. Judge did not receive any payments from the Roosevelt Fund. Any agreement that ARGO had with Ms. Judge was only with her, and did not involve Mr. King.
- Ms. Judge continues to work for ARGO. No evidence was found that, other than payments for services rendered, ARGO provided any "financial assistance" to Ms. Judge, or made payments to facilitate her campaign for office in 2012.

After a careful review of the alleged violations and relevant facts, we have concluded our investigation. No evidence was found that ARGO Strategies or Jason Bennett, as treasurer for the Roosevelt Fund, inaccurately reported expenditures from the Roosevelt Fund, or aided in an embezzlement scheme for Mr. King. No evidence was found that Jason Bennett or Michael King concealed the nature of expenditures from the Roosevelt Fund to ARGO for a database project. No evidence was found that ARGO or Jason Bennett provided any payments to Maureen Judge that she did not earn as a contractor for ARGO Strategies. No evidence was found that Mr. King directed or assisted in a plan to pay Ms. Judge for work she did not perform.

Because staff's investigation did not reveal any evidence to establish a violation of any laws or regulations under the Commission's jurisdiction, I am dismissing your complaint against ARGO Strategies and Jason Bennett, Michael King, and the Roosevelt Fund with the concurrence of the Chair of the Public Disclosure Commission.

If you have questions, please contact Phil Stutzman, Director of Compliance, at (360) 664-8853 or toll-free at 1-877-601-2828 or by e-mail at phil.stutzman@pdc.wa.gov.

Sincerely,


Andrea McNamara Doyle
Executive Director

c: ARGO Strategies and Jason Bennett
Michael King (c/o Lyle Tenpenny)
The Roosevelt Fund (c/o Phil Lloyd)