

[Info](#) (Thu, 11 Oct at 11:50 AM)

to : [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Hi Tabatha,

Attached is our response to the complaint (#41472).

Thank you for your attention in this matter.

Robert J Sutherland – Candidate (R)

State Representative, District 39

E: [info@sutherland4rep.com](mailto:info@sutherland4rep.com)

Ph: 425.512.7784

P.O. Box 1311, Monroe, WA 98272

Web: [www.sutherland4rep.com](http://www.sutherland4rep.com)

Tabitha Blacksmith  
PDC Compliance Coordinator

Re: PDC Case #41472

We believe the complaint regarding the 'Friends of Sutherland' committee receiving campaign donations from the 'Olbrechts for Judge' committee is warrantless. There have been absolutely no donations made nor any donations received between these two committees. We believe Jordan Sears may be confused with respects to what constitutes a "contribution" and what qualifies as a "miscellaneous receipt."

Both political committees communicated with the PDC by email concerning one campaign attaching political signs to another campaigns political sign structures, and whether doing so was authorized or unauthorized. Here are the communications between the two committees and the PDC:

On Tue, 17 Jul at 11:52 AM , Robert J Sutherland <[robertjsjr2013@gmail.com](mailto:robertjsjr2013@gmail.com)> wrote:

Hello, Is it allowable for two different campaign committees/candidates to share wooden structures that hold large campaign signs? If one campaign paid for and built the structure, attached one of their signs to it and another campaign wishes to also attach one of their campaign signs to it, with their permission, is this permissible in WA State? Thank you! **Robert J. Sutherland**

On Fri, 20 Jul at 8:18 AM , PDC Support <[pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)> wrote:

Dear Mr. Sutherland, Thank you for your question. Candidates may not contribute to other candidates. If your campaign uses the structure with permission, that would be considered an in-kind campaign contribution. **If you choose to use the structure, you would need to either rent or purchase part of it for a fair market price determined by you and the other campaign. Then, you would write a check to them and they would list this as Miscellaneous Receipts** in their C-4 report.

Please feel free to contact the PDC again if you have further questions.

Thanks, Jenny Polek  
Public Disclosure Commission  
Filer Assistant

Dear Mr. Sutherland, Please forgive me, I meant to write that they would list this as **Miscellaneous Receipts** in their **C-3 report**.

Thank you, Jenny Polek  
Public Disclosure Commission  
Filer Assistant

On Fri, 31 Aug at 11:45 AM , Kristen Olbrechts <[kolbrechtslaw@gmail.com](mailto:kolbrechtslaw@gmail.com)> wrote:

Chip, I am contacting you to confirm the communication we had last week regarding the purchasing and leasing of signs from another campaign. As we discussed, a campaign for a candidate running for State Legislature has sign stands and sign spaces. My campaign, a judicial campaign, wishes to purchase a number of the sign stands and lease several more.

Based on our conversation I believe that you advised that my campaign could purchase and/or rent sign stands from the other campaign. Additionally, that the purchase or rent needed to be fair market value as determined by both of the campaigns.

Finally, it is my understanding that my campaign would write a check to the other campaign, and they would list this as a receipt in their C-4 report.

I know you are very busy. I do appreciate you taking the time to respond as soon as possible as we are waiting for confirmation in writing. If you could email me back and reiterate and confirm the above.

Thank you, Kristen

**From:** PDC Support <[pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)>

**Date:** August 31, 2018 at 1:50:49 PM PDT

**To:** [kolbrechtshaw@gmail.com](mailto:kolbrechtshaw@gmail.com)

**Subject: Re: PDC - Get help or information - Kristen Olbrechts**

**Reply-To:** PDC Support <[pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)>

Hi Kristen, Everything you stated is correct with the exception that the other campaign will report the check you write to them as a miscellaneous receipt on a C-3 deposit report. Your campaign will report the expenditure on a Schedule A to the C-4.

SINCERELY, Chip Beatty 360-586-0616

After communicating with my Treasurer he has confirmed that we did list the two "miscellaneous receipts" from this transaction with the 'Olbrechts for Judge' committee on the correct C3 forms, as directed by the communications with PDC personnel (above).

We believe the communications listed above between the two political committees and the PDC should satisfy the PDC Compliance Department and Mr. Sears that no "contributions" were made nor received by either committee.

Sincerely,

Robert J. Sutherland-Candidate  
State Representative 39<sup>th</sup> Leg. Dist. Pos. 1  
(425) 512-7784  
[Infor@sutherland4rep.com](mailto:Infor@sutherland4rep.com)