

November 21, 2017

**To: PDC Support**

**From: Nancy Tosta, [ntosta@comcast.net](mailto:ntosta@comcast.net), 206.886.5591**

**Re: PDC Case Number 27520 (Complaint filed by Chestine Edgar on 11/13/17)**

Please find my responses to the allegations brought forth by Ms. Chestine Edgar on 11/13/17. She alleges violations in C3 and C4 reporting and failure to accurately detail expenditures. I will note that during this Nov 2017 election Ms. Edgar very actively and publicly supported my opponent, who ultimately did not win. Below are my responses to her allegations. Please contact me via email or phone if you have additional questions or concerns. Thanks very much.

**Allegation #1:** Violation of RCW 42.17A.205 for failure to register political committee in support of Nancy Tosta, Krystal Marx, Jimmy Matta, and Pedro Olguin.

**Response:** I was responsible for my own campaign and was not part of a political committee with these other candidates. We did coordinate some events at which we all appeared and worked with volunteers and in a few cases, we contributed ¼ of the cost of food, phone-bank database, rental space, and printed campaign materials. We did not seek outside funding for these coordinated efforts, but each contributed from donations we'd received individually. Less than five percent of the campaign contributions I'd raised were used to fund our shared events/activities.

**Allegation #2:** Violation of RCW 42.17A.240 and WAC 390-16-037 for failure to provide detailed breakdowns of expenditures for GOTV campaigns and services expenditures.

**Response:** I worked with the three other candidates to conduct phone-banking activities to get out the vote (GOTV). We used a phone-banking database that was paid for by Pedro Olguin's campaign that cost \$500. I paid ¼ of this cost (\$125) to his campaign as I reported on my C4 filed on Oct 31, 2017 (#100798881 which was amended #100797842). We used volunteers solicited by myself and the other candidates, as well as calls put out by various organizations such as the 33<sup>rd</sup> and 34<sup>th</sup> District Democrats and the WA State Democrats. No funds were received for this activity from these organizations.

**Allegation #3:** Violation of RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately report proportional share of shared rental spaces.

**Response:** I made payment to "Friends of Jimmy Matta" of \$132.50 (which was ¼ of the \$530.01 cost paid by Jimmy Matta for use of the Tijuana Restaurant. This space was used as a meeting place for conducting phone-banking and door-belling activities related to my and others' campaigns. This expenditure was reported on my C4 filed on Oct 31, 2017 (#100798881 which was amended #100797842)

**Allegation #4:** Violation of RCW 42.17A.235 for failure to timely report postage and/or distribution expenses for a "Fantastic Four" mailer.

**Response:** Two "doorbellers" were produced on behalf of the four candidates – Nancy Tosta, Krystal Marx, Pedro Olguin, and Jimmy Matta. These were not mailed, but were used for

reaching out to voters via door knocking. There were no associated mailing expenses to report. There were two versions of the doorbell materials printed. The first, printed in early October, showed "Paid for by the King County Democrats" on the flyer. At the time, I'd been asked by the King County Democrats to contribute ¼ of the cost to this flyer and did so (\$146.03 paid to King County Democrats, reported on my C4, originally filed 10/16 and subsequently amended on 10/31 as #100797840). The King County Democrats then informed me on November 8, 2017, that this was to be an in-kind contribution on their part and that they were refunding the check for \$146.03 that I'd sent them. This will be amended/reported on the upcoming December C4 report. The second doorbeller was printed in early November with the statement "Paid for by ReElect Tosta" and the other four candidates. We each paid one quarter of cost of this flyer (\$178.54), to Overnight Printing. This will be reported on the December C4.

**Allegation #5:** Violation of RCW 42.17A.235 for failure to report in-kind contributions or expenditures for political advertising sponsored by the WA State Democratic Party.

**Response:** To my knowledge, the WA State Democratic Party did not provide contributions to or pay for political advertising for my campaign. They verbally supported the campaign during attendance at gatherings and occasionally identified potential volunteers for phonebanking and doorbelling.