

Jim replied 2 days ago (Sun, 20 Nov at 8:52 PM)
to : pdc@pdc.wa.gov

Jacob, please see my response below. Thanks! Jim

To whom it may concern,

Please find below my campaign's responses to the complaint filed by Glen Morgan.

1. Yes, I produced a Facebook Video. On my own. At home. At NO COST whatsoever. Didn't come out bad, we thought, considering I am an amateur. It was produced and exclusively used for social media in a way that it was always clearly connected to the official campaigns channels and never appeared anywhere else. The RCW in question requires sponsor ID on radio, TV, or printed advertising. Because this video is not advertising as defined by RCW 42.17A.320(1), it does not require the sponsor ID.

2. Again, at no cost. We can clearly affirm we have not violated 42.17A.320(1) – see #1 above.

3. I am truly flattered Mr. Morgan believes my videos were 'professionally produced'. And he is correct – we omitted them in all our C3's and C4's. Now, we omitted them on C3's simply because that's where you report cash contributions, not in-kind nor expenditures. On our C4's, since we had no expense, we didn't list any. As to in-kind contribution – I am not a professional producer of videos. There is no contribution to report – or if there is, I also then have neglected to report the time I spent putting screws in yard signs, etc.

4. I keep reading RCW 42.17A.320 – and have yet to find any mention of websites at all. And there's reason – it's self-evident. The very website address is Elect Jim Cooper. On that website, the committee address is clearly listed and there's several means to contact the campaign. It is clear whose website this is. And yes, if this was an email blast, print ad, radio commercial, TV spot, Billboard, or any other type of outside advertising – we would absolutely have had explicit sponsor ID. But this isn't, it's a website. It's static. We aren't mailing it or sending it in any way. A website owned by the campaign is just that, a static asset, not an advertising communication. More important, all contact information is right there on the website.

Quite frankly, we feel this complaint is a bit frivolous and over the top. We are happy to respond, and we take PDC rules and Washington's laws seriously, but we just don't feel any of these complaints are actual violations.

If you need anything further from me, just let me know.

Cordially,

Jim Cooper (working towards a career in video production)

Jim Cooper