

To Whom It May Concern:

The following provides additional context in response to complaint #141992. All persons associated with the committee emphatically deny any alleged theft, misuse, or diversion of campaign funds. At no point has anyone endeavored to conceal political activity. The committee recognizes the importance of transparency and is committed to complying with all campaign finance laws and regulations.

Adjustments to the carry-forward balance between campaign years.

The complaint speculates that campaign funds have “disappeared” as a result of “potential theft.” This allegation is baseless and offensive. In fact, this concerns a simple accounting issue related to the final report of one calendar year and the initial report of the next, which has been addressed. The Treasurer has consulted with a PDC filing specialist to amend reports to reconcile an overstatement of income in 2021 to match the correctly reported starting balance for 2022. Attached is a concise summary of the corrected items, including a bounced check and duplicate contribution.

The complaint asserts that \$4,000 “magically appeared” in the first report of 2023. This allegation is also unfounded and results from the difference between original and amended reports. In early 2023, the Treasurer sought the guidance of the PDC to amend the final report for 2022 to include a contribution postmarked the previous year but delayed in transit until after the filing of the first report of the new year. It is important to note that the starting fund balance was the same between the original final report of 2022 and the initial report for 2023. Considering the earlier amendment, the Treasurer has amended subsequent reports to reflect the higher starting balance.

Lastly, no new correction was necessary to account for \$44 in interest payment income in 2019. The complaint points to an original report (#100952801), while the amended report ([#100962135](#)) accurately reflects the updated ending balance for 2019.

Allegations of delayed reporting.

Notwithstanding the amendments described above, all reports were previously filed prior to any complaint. There are no missing C3 or C4 reports. Rather, the complaint concerns certain reports that the complainant alleges were untimely filed. The complaint often misunderstands the facts: reports were timely filed. At no point has the committee “[a]ttempt[ed] to conceal the truth about political activity from the public.”

The Treasurer identified fourteen items the complaint has marked as “late,” which, in fact, refer to *amended* reports, not *original* filing dates. For instance, #110064153, labeled 43 days late, is an amendment to [#110056621](#), which was timely submitted 56 days earlier. The amended report corrects the source of one contribution that was inaccurately associated with a previous contributor file sharing the same three-letter acronym. In another example, reports #100962135 and #100962131 are labeled 81 days late, but the Treasurer filed originals before the “projected due date” indicated in the table ([#100952801](#) and [#100947959](#)). In this case, the amended reports corrected an inverted digit from \$3,917.40 to \$3,971.40, reflecting a \$54 difference.

As these examples show, there are serious accuracy issues with the spreadsheet provided by the complainant. Given the length of the complainant's submission, the fact that it appears based on estimates ("projected due date"), and that it requires line-by-line verification, the Treasurer has not been able to do a comprehensive verification. However, even setting aside the complaint's errors with regard to original/amended submissions, there are other simple responses to the allegations.

Based on the information provided, eighteen items refer to reports with zero activity. Within the last year, the complaint identified seven non-zero non-amended items. One of these items is the accompanying C3 to #110056621 described above. The Treasurer previously contacted the PDC related to report #110130053 and resolved a filing error that associated committee reports with another filer ID. The content of the C4 substantially replicates information already disclosed in C6 reports. Four other items show delays of one to five days. The recent transition from ORCA to the new PDC online filing system has been a process adjustment. The Treasurer regrets not observing the change to the C3 reporting schedule beginning on the first of June and the delay in filing #110159281 at the same time as the C4. These delays were inadvertent and have been addressed going forward.

Most identified "late" reports ranged from two to three years ago when the committee was less consistently active. Six non-zero non-amended items are identified from 2020, averaging six days late. The committee was largely inactive during the first half of 2021. This period coincided with the Treasurer experiencing a personal hardship, which led to longer than acceptable delays in filing some reports. The Treasurer received all necessary information from the Campaign Manager to file reports and regrets these delays. The Treasurer rectified reports and disclosed the circumstances to the PDC in 2021, long before the present complaint.

Again, the committee takes its reporting obligations very seriously. Much of the complaint is simply inaccurate or addresses reports previously discussed with the PDC and corrected where needed with the PDC's guidance. The committee regrets instances where reports were delayed but respectfully submits that the underlying facts here do not support the complaint's inflammatory allegations.

Website sponsor identification.

The complaint asserts that the committee violated RCW 42.17A.320, WAC 390-18 because its website does not list the "top five" contributors to the committee. This allegation has no merit.

To the committee's knowledge, identification requirements, including for an organization's website, are set out WAC 390-18-010. As to organization websites, WAC 390-18-010(5) provides: "Political committee websites and other online forums created by a political committee must include sponsor identification." By clearly disclosing the sponsor's name and address, the committee [website](#) complies with WAC 390-18-010 (5).

WAC 390-18-010 draws a distinction between committee websites and *political advertising*, including advertising undertaken as an independent expenditure or electioneering communication. The latter requires "top five" contributor disclosure. The former does not.

To confirm its understanding, the committee has diligently reviewed relevant PDC guidance, encompassing RCW 42.17A.320, WAC 390-18-010, WAC 390-18-025, and PDC Interpretation No. 07-04, pertaining to the disclosure of the committee's top five contributors. RCW 42.17A.320(2) and WAC 390-18-010(1)(b) require the top five contributor disclosure on all advertising "undertaken as an independent expenditure or electioneering communication." Again, the committee has found no authority suggesting that committee websites must include top five contributor information.

Here, the committee's website features two embedded YouTube videos from a previous campaign cycle, explicitly revealing the top five contributors associated with those expenditures. Absent further clarification from the PDC, the committee does not interpret its website to meet the definition of independent expenditure or electioneering communication, and it has not undertaken any expenditure or mass communication to direct the public to its website.

Statement from the Treasurer.

Finally, given the nature and tenor of the complaint's allegations, the committee provides the following responsive statement from its Treasurer:

I am profoundly unsettled by the nature of this complaint, which challenges my commitment to transparency and integrity. As the Treasurer, I hold my responsibilities in the highest regard. Over the years, I've greatly appreciated the guidance and support provided by the PDC as I've navigated the complexities of campaign finance laws and regulations. I willingly accept accountability for any discrepancies and reporting delays that may have occurred due to unforeseen and challenging life circumstances. Whenever such issues arose, I proactively sought resolutions and maintained open communication with PDC staff to promptly take corrective action. Upon receiving this complaint, I immediately acted, meticulously investigating the discrepancies, and swiftly engaged a PDC filing specialist to address and rectify any issues. The committee is reviewing its systems and processes to ensure timely and accurate compliance.

ATTACHMENTS

The following corrections reduced income by \$4,176.12 in 2021 to match the accurately reported starting fund balance in 2022.

Reported a check deposit that subsequently bounced and incurred a bank fee.	\$1,000.00
Incorrectly recorded bank deposit.	\$1,000.00
Pledges reported as contributions that were never received or deposited.	\$500.00
Double counting of a single contribution from a couple.	\$1,000.00
Sound Strategies Graphic Design	\$400.00
Stripe payment processing fees.	\$144.12
Bank service charges, including wire transfer fees and NSF fee	\$132.00