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Mx. Fox Blackhorn

Compliance Coordinator 2

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Public Disclosure Commission

To Mx. Fox Blackhorn,

This letter is in response to correspondence I received from you on Dec 10, 2020 requesting a response to complaint, PDC case number 27263, filed by Doug Starcher on 11/6/2017. The details of the filed complaint are listed as allegations below.

In response to the allegations, I would like to first restate my initial response from 11/14/2017 and recognize that ignorance is not an acceptable excuse, especially considering the accusations are violations of law. With that in mind, I will respond to these allegations with honesty, integrity and to the best of my ability.

My responses will be noted subset to each numbered bullet point.

The complainant alleges the following:

1. Allegation One: Violation of RCW 42.17A.265 and RCW 42.17A.305 for failure to file C-6 for political advertising within 24 hours of appearing to the public.
 - Admit with explanation. I had initially thought that I processed the C-6 correctly however, after the initial filing date had come and gone we heard that a complaint had been filed. I contacted the PDC and spoke with Chip to verify that we had filed correctly. Only then did I learn that I had not filed the C-6 correctly. I promptly corrected while on the phone with Chip.
2. Allegation Two: Violation of RCW 42.17A.265 for failure to report a Last-Minute Contribution within 24 hours of receipt.
 - Deny with explanation. When I initially entered our donations in Orca, I entered an incorrect deposit date in March 2017. A March deposit date would not have been possible because our PAC wasn't established until Sept 27 and our bank account wasn't opened until the next day, Sept 28.
3. Allegation Three: Violation of RCW 42.17A.320 for failure to list Top Contributors and Committee Sponsor on political advertising.
 - Admit-The PAC committee was not aware of this requirement.

4. Allegation Four: RCW 42.17A.555 may only be violated by government employees and officials, not political committees.
 - Deny- The committee members were extremely careful not to discuss PAC issues while being paid by our employer.
5. Allegation Five: Violation of RCW 42.17A.235 for failure to timely report contributions and expenditures.
 - Admit with explanation. See explanation for # allegation #1.

In closing and as Mr. Starcher states in his complaint, we were a brand-new committee consisting of four individuals who have little or no experience in political campaigning in any way, including myself as the Treasurer. Contrary to his comment of it being a revolving door of committee members, none of us participated in the 2015 jail campaign (PDC Complaint 1125) that Starcher references in his closing comments.

I hope this satisfies your requests for response to the allegations satisfactorily. If not and you require additional information or clarification please do not hesitate to contact me.

Respectfully,

Barry Lovell
Treasurer- One Safe Jail
360-296-1504