

Philip Lloyd (Thu, 31 Oct 2019 at 6:35 PM)

Thank you for your email of October 24th. We have had an opportunity to review the complaints filed by Mr. Morgan and would like to respond to all three complaints together if that would be acceptable. The subsequent two complaints both pertain to the top five contributor disclaimer on the committee's mailings.

With regard to the mailings, the exclusion of the top five contributors was unintentional. The mail vendor, AMS Communications, did not adequately review the Washington Sponsor ID requirements and the lack of the top five was missed when the ads were reviewed by campaign staff. Upon receipts of the complaint, we immediately notified our staff and the vendor and future mailings did include the top five. We apologize for this omission. We completely disagree with Mr. Morgan's assertion that this violation was "flagrant and willful". Clearly our campaign finance reports state who our donors are and they are widely reported by the media. It was simply an honest mistake. Note also that our TV and on-line video ads (a far greater percentage of our advertising spending) have the correct top five disclaimer so clearly there was no intent to violate the law.

With regard to the second allegation of inadequate details of expenditures, we feel that we have provided adequate detail, including detailed reports of our media buys that have been sent promptly to the PDC to append the committee's C4 reports. We also included quantities of mail pieces sent on our most recent C4 report and have amended the previous C4 to include this information since Mr. Morgan apparently would like to know this information, which we are happy to provide. We believe that WAC 390-16-037 is unclear about whether actual quantities need to be reported since subsection (1) does not apply since the Committee's C1pc already identifies our opposition to I-976 and sub-section (2) only applies to expenditures made to a candidate or a political committee. We did not make payments to candidates or political committee. RCW 42.17A.240(6) requires the committee to disclose "The name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures." Our filings disclosed all of this information.

Please let us know if you have any questions or if you need additional information.

Philip Lloyd, Treasurer
Keep Washington Rolling