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October 27, 2019

Fox Blackhorn  
Compliance Coordinator 2  
Public Disclosure Commission  
P.O. Box 40908  
Olympia, WA 98504-0908

RE: Citizens for Liberty and Labor: Alleged violations of RCW 42.17A.320

Dear Mx. Blackhorn:

On behalf of Citizens for Liberty and Labor (“the Committee”), I am hereby responding to the allegations raised by Mr. Glen Morgan in the above-referenced matter.

Mr. Morgan’s allegation that the committee “never intended to follow the law” with respects to Washington State’s campaign finance law is unfounded, as described herein. At worst, the Committee made an error in its good faith efforts to disclose all relevant information to the public.

As discussed in more detail below, the PDC should work with the Committee to ensure that any errors are corrected in a way which satisfies the law. The violations alleged by Mr. Morgan are either unmeritorious or involve de minimis and technical violations that do not warrant judicial enforcement.

**1. “Failure to properly identify top contributors in political television, IEs, etc (and Youtube) advertising (Violation of RCW 42.17A.320).”**

Without the Committee conceding to his allegations of malicious intent, Mr. Morgan correctly identifies several advertisements and other independent expenditures wherein the Committee failed to properly identify top contributors. While the Committee made every effort to disclose the nature of its financing, the implementation of new disclosure requirements was unknown.

At worst, this constitutes a technical violation. As discussed in more detail below, the Committee has already taken steps to amend this error in a timely fashion.

***Conclusion***

The Committee has consistently made every effort to comply with Washington State campaign finance law, as evidenced by its timely and accurate filing of reports to the PDC. It has never been the intent of the Committee to withhold, obscure, or otherwise conceal the nature of its financing from the public. While Mr. Morgan’s allegation that we failed to properly identify top contributors is technically accurate, the Committee holds that it is insufficient to support the further claim that this error constitutes intent to deprive the public from meaningful information.

Indeed, since the Committee was made aware of this error, we have worked to research and update our disclosure as follows:

No candidate authorized this ad. It is paid for by Citizens for Liberty and Labor PAC, P.O. BOX 18845, Spokane, WA 99228. Top 5 Contributors: Spokane Firefighters Union PAC, SEIU Union WA State Council PAC, UFCW 21 PAC, Fuse Votes, Washington Conservation Voters Action Fund. Top 3 Donors to PAC Contributors: SEIU, UFCW 21, Craig Mckibben

Note that the SEIU and UFCW 21 are the top contributors (non-PAC organizations) to the federal PACs outlined in Mr. Morgan's complaint. The Committee has also worked to update, where possible, all existing advertisements and independent expenditures which necessitate disclosure wording.

For the foregoing reasons, I believe that it would be appropriate for the PDC to work with the Committee to ensure that any errors are corrected in a way which satisfies the law. Further, I believe that the PDC should dismiss the allegation of malicious intent outright.

If you have any questions, or if there is anything else I can do to be of assistance to you, please do not hesitate to contact me.

Sincerely,  
Geoffrey Bracken  
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CC: Randy Marler (via email)