



November 4, 2019

Fox Blackhorn
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

RE: PDC Case No. 59299, Better Spokane PAC

VIA EMAIL ONLY

Dear Mx. Blackhorn:

I am replying on behalf of my client, Better Spokane PAC (the Committee) to your email of October 25, 2019 requesting a response to a complaint filed by Glen Morgan (the Complainant) with the Public Disclosure Commission (PDC), alleging violations of RCW 42.17A.

The allegations mostly relate to contributions received by the Committee from “The Standard Trust” on November 4, 2017 (\$5,000) and April 9, 2019 (\$30,000) and disclosed on C3s No. 100799363 and No. 100902757, respectively. *Attachments 1, 2.*

1. Allegation One: Violation of RCW 42.17A.240 for failure to accurately and completely disclose contributor address information

The Committee received both contributions from the account of The Standard Trust via checks No. 11045 and No. 11737, respectively. *Attachments 3, 4.* Both contributions to the Committee were facilitated by Alvin Wolff, Jr. who serves on an advisory committee of the Committee. The Treasurer of the Committee, Michael Cathcart, understood The Standard Trust to be a Wolff family fund and had no reason to believe any funds came from a prohibited source.

Per federal and state law, the Committee may take contributions from almost any U.S. source without limit and had no need to discern further information for attribution purposes. At no time did Mr. Wolff express to the Committee any interest in concealing any contributor information to the public.

Both checks list an address of 11016 E. Montgomery Drive Ste. 102, Spokane, WA 99206. The Committee Treasurer never had any reason to believe that the address on the checks was not accurate. The Committee made a good faith effort to disclose that address on both C3s. However, the zip code on C3 No. 100799363 is off by one digit and should be “99206” instead of “99201”. Similarly, the contribution disclosed on C3 No. 100902757 is missing a street address, and also

restates the earlier erroneous zip code. The committee believes a database error contributed to the second error and both reports have been amended.

2. Allegation Two: Violations of RCW 42.17A.205 and .320, and WAC 390-16-011A for failure to disclose the name of Standard Trust as the sponsoring person in the committee's name on the Political Committee Registration (C-1pc report) and on political advertising.

The Committee agrees that because of the contribution made to the Committee by the Standard Trust on April 9, 2019 that it should have amended its C1pc by April 23, 2019 to disclose Standard Trust as a sponsor of the Committee. The Committee has amended its C1pc to reflect this information. The limited political advertising by the Committee listed "The Standard Trust (Alvin J Wolff Jr)" as a top five contributor. *Attachment 5.*

3. Allegation Three: Violations of RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205 for failure to accurately disclose details of expenditures, including the number of items printed, and sub-vendors utilized by the campaign for political advertising.

While substantial expenditure detail is disclosed on the Committee's C4 filings, the Committee has amended its 2019 C4 reports to provide even further detail. The Committee will update all earlier C4 reports by November 8, 2019 presuming that PDC staff can provide technical assistance for doing so during the week.

I hope you find this information useful. Please contact me if I can provide further information.

Sincerely,



Dan Brady

ATTACHMENTS

1. C3 No. 100799363
2. C3 No. 100902757
3. October 30, 2019 Standard Trust Check No. 11045
4. April 4, 2019 Standard Trust Check No. 11737

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE
 100902757
 05-10-2019

Candidate or Committee Name (Do not abbreviate. Use full name.)
Better Spokane PAC

Mailing Address
510 W. Riverside, Suite 500

City **Spokane, WA** Zip + 4 **99201** Office Sought (candidates) _____ Election Date **2019**

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
04/09/19	THE STANDARD TRUST Spokane, WA 99201				\$30,000.00	\$30,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$30,000.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$30,000.00

4. Date of Deposit **04/09/19**

Treasurer's Daytime Telephone No.: **(509)999-8315**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature **Michael J Cathcart** Date **05-10-2019**

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100799363

11-06-2017

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Better Spokane PAC

Mailing Address
 510 W. Riverside, Suite 206

City: Spokane, WA Zip + 4: 99201 Office Sought (candidates): Election Date: 2017

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
11/04/17	THE STANDARD TRUST 11016 E Montgomery Dr. STe 102 Spokane Valley, WA 99201				5,000.00	5,000.00
		Occupation				
11/04/17	GEMSTAR MANAGEMENT LLC 1620 N. Mamer Rd. C-400 Spokane Valley, WA 99216				5,000.00	5,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			10,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

10,000.00

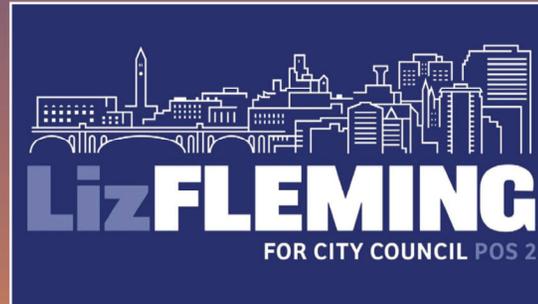
4. Date of Deposit: 11/04/17

Treasurer's Daytime Telephone No.: (509) 241-4714

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: ANDREA ZAMAN Date: 11-06-2017

- » Putting people above politics.
- » Fighting back against criminals.
- » Empowering local employers.
- » Accountable homelessness policies.
- » Prioritizing our streets.



Visit voteCindyWendle.com and voteLizFleming.com to learn more.

Vote by August 6th
to advance these bold new leaders!

NO CANDIDATE AUTHORIZED THIS AD. PAID FOR BY BETTER SPOKANE PAC
510 W. Riverside Ste 500, Spokane, WA 99201, Top Donors includes, The Standard Trust (Alvin J Wolff Jr),
A Better Spokane. Photos and images are taken from public domain.

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND • PADLOCK ICON DISAPPEARS WITH HEAT • FLUORESCENT FIBERS AND OTHER SECURITY FEATURES

THE STANDARD TRUST
11016 E. MONTGOMERY DRIVE STE 102
SPOKANE VALLEY, WA 99208

WASHINGTON TRUST BANK
MEMBER FDIC
PO BOX 2127
SPOKANE, WA 99210-2127
28-8
1251

11737

4/9/2019

PAY TO THE ORDER OF Better Spokane PAC

\$ **30,000.00

Thirty Thousand and 00/100***** DOLLARS

Better Spokane PAC
510 W. Riverside Ave., Ste 206
Spokane, WA 99201

MEMO

Paul Fisher

MEMO

⑈0 1 1 7 3 7⑈

Tr #: 15005208 - Ck #: 11737 - Amt: \$30,000.00 - 04/09/2019

20190409
Washington Trust Bank
2701 22

2701 22 04/09/19

Deposit to
1000474286

Tr #: 15005208 - Ck #: 11737 - Amt: \$30,000.00 - 04/09/2019

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND • PADLOCK ICON DISAPPEARS WITH HEAT • FLUORESCENT FIBERS AND OTHER SECURITY FEATURES

THE STANDARD TRUST
11016 E. MONTGOMERY DRIVE STE 102
SPOKANE VALLEY, WA 99206

WASHINGTON TRUST BANK
MEMBER FDIC
P.O. BOX 2127
SPOKANE, WA 99210-2127
28-8
1251

11045

10/30/2017

PAY TO THE ORDER OF Better Spokane PAC

\$ **5,000.00

Five Thousand and 00/100..... DOLLARS

Better Spokane PAC
510 W. Riverside Ave., Ste 206
Spokane, WA 99201

MEMO

David Larkin

MEMO

⑈0 1 1045⑈

Tr #: 15015932 - Ck #: 11045 - Amt: \$5,000.00 - 11/02/2017

20171102
Washington Trust Bank
1007 16

10/30/2017

ENDORSE TO THE ACCOUNT OF THE
PAYEE'S BANK OR PAYEE IN
THE ABSENCE OF
ENDORSEMENT GUARANTEED.
WASHINGTON TRUST BANK

Tr #: 15015932 - Ck #: 11045 - Amt: \$5,000.00 - 11/02/2017