



November 4, 2019

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

RE: PDC Case No. 59233, Smart Reforms for a Better Spokane

VIA EMAIL ONLY

Dear Mx. Blackhorn:

I am replying on behalf of my client, Smart Reforms for a Better Spokane (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.

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

The Committee received a contribution from “The Standard Trust” via check No. 11740. *Attachment 1*. This contribution to the Committee was facilitated by Alvin Wolff, Jr. who serves on an advisory committee of the Committee.

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. 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. At no time did Mr. Wolff express to the Committee any interest in concealing any contributor information.

The check lists 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 check was not accurate. The Committee made a good faith effort to disclose that address on C3 No. 100902762 but did not notice that the street address was missing on the C3 submitted nor that the zip code listed was off by one digit and should be “99206” instead of “99201”. *Attachment 2*. That report has been amended with the correct address.

2. Allegation Two: Violation of RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205 for failure to provide complete and accurate details of expenditures, including sub-vendors utilized by the campaign.

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.

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

Sincerely,



Dan Brady

ATTACHMENTS

1. April 9, 2019 Standard Trust Check No. 11740
2. C3 No. 100902762

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

11740

4/9/2019

PAY TO THE ORDER OF Smart Reforms for Better Spokane

\$ **20,000.00

Twenty Thousand and 00/100..... DOLLARS

Smart Reforms for Better Spokane

MEMO

David J. [Signature]

MEMO

⑈011740⑈

Tr #: 15005205 - Ck #: 11740 - Amt: \$20,000.00 - 04/09/2019

20190409
Washington Trust Bank
2701 21

2701 21 04/09/19

Deposit to
1000821335

Tr #: 15005205 - Ck #: 11740 - Amt: \$20,000.00 - 04/09/2019

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE
 100902762
 05-10-2019

Candidate or Committee Name (Do not abbreviate. Use full name.)
Smart Reforms for a Better Spokane

Mailing Address
510 W. Riverside, Suite 500

City **Spokane, WA** Zip + 4 **99217** 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		<input type="checkbox"/>	<input type="checkbox"/>	\$20,000.00	\$20,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$20,000.00	*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.

\$20,000.00

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**