

November 14, 2019

VIA EMAIL

Washington Public Disclosure Commission
Att'n: Fox Blackhorn, Compliance Coordinator
711 Capital Way Room 206
PO Box 40908
Olympia, Washington 98504-0908

Re: Case Number 59539

Dear Mx. Blackhorn:

I write on behalf of Washington Conservation Voters Action Fund (WCVAF), a Washington State political action committee, to respond to the Complaint filed against WCVAF by Glen Morgan with the Commission on October 30, 2019.

WCVAF takes seriously its compliance responsibilities as a registered Washington State political action committee and strives to follow all applicable reporting requirements. WCVAF strives to complete its filings in a timely and compliant manner and has done so since it has been a registered political action committee.

WCVAF is in receipt of the Complaint dated October 30 filed by Glen Morgan with the PDC, which you forwarded by email dated October 31. WCVAF completed its Form C4 dated October 29, 2019 in good faith with significant detailed disclosure regarding each expenditure and the purpose of each expenditure, in a manner that complied with RCW 42.17A.240 and the instructions on Schedule A to the Form C4. As required by RCW 42.17A.240(6), WCVAF's report included the name and address of each person to whom an expenditure was made in the aggregate of more than \$50 during the period of the report, the amount, the date, and the "purpose of the expenditure" as well as the total sum of all expenditures. For each of its 19 separately listed expenditures, WCVAF provided a clear description of the expense and its purpose, for example, "direct mail" or "staff time (in kind to Kristin Walker)."

To provide the further details requested, WCVAF has filed an amended Form C4, amending the report filed October 29 with additional information regarding its expenditures, including the number of items printed for political advertising, and where applicable, the candidate supported or opposed, and other available detail. In certain instances, WCVAF incurred expenses for videos and ads urging people to vote, without specifying a particular candidate or political party; for those expenses, no update regarding a candidate supported or opposed is needed.

WCVAF and its officers and staff strive to stay up to date with and comply with the filing and reporting requirements of Washington State campaign finance law. As part of its commitment to compliance, WCVAF will continue to educate and train staff regarding the PDC's online publications and its regulations. WCVAF takes care to file its reports in a timely and thorough manner. Any omission in the amount of detail provided regarding its expenditures in the Form C4 referenced in the Complaint was unintentional and inadvertent.

WCVAF respectfully requests that the PDC accept its amended report which provides additional detail for certain of its expenditures. In light of the explanation of its good faith compliance efforts submitted herewith, the amendments made by WCVAF to its Form C4, and WCVAF's commitment to ensuring compliance with PDC and Washington State reporting and filing requirements, WCVAF requests that the PDC conclude that no evidence supports a finding of a material violation warranting further investigation, and that it dismiss the complaint and close the matter without further action.

If you have any questions, or to request additional information, please contact me or Treasurer Sean Pender at 206-374-0760.

Sincerely,

A handwritten signature in cursive script that reads "Shannon Murphy".

Shannon Murphy

President

Washington Conservation Voters Action Fund