

November 27, 2019

VIA EMAIL

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

Re: Case Number 59657

Dear Ms. Blacksmith:

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 November 18, 2019. Thank you for forwarding that complaint to us, consolidating it with the pending Complaint filed by Mr. Morgan and providing us with the opportunity to respond.

In response to the earlier complaint filed by Mr. Morgan, WCVAF undertook a careful review of its PDC filings in order to determine whether any further amendments to the filings made with the PDC would be appropriate. As stated in our November 14, 2019 response, WCVAF amended certain filings in order to provide additional details. During that review, WCVAF noticed that its October 30 Form C4 listed two separate expenditures of \$8,719.82 to the same vendor, Hopkins & Sachs. While the expenditures were fully reported on the referenced Form C4 report, WCVAF recognized that in fact the expenses related to two separate mailings, despite the identical amount and identical vendor, and that a separate Form C6 should have been filed for each expenditure. Upon discovery of this inadvertent omission to file one Form C6, WCVAF promptly submitted a separate Form C6 for the single Hopkins & Sachs expenditure for mailings. As referenced in the response to the October 26 complaint, the person primarily responsible for preparing WCVAF campaign finance filings was caring that week for a family member who had suffered an illness, and WCVAF's filing was delayed as others scrambled to make all needed filings.

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 has taken steps to educate and cross-train staff and will continue to educate, train and cross-train staff regarding political activity reporting, so that if a staff member

is out of the office for any reason, WCVAF remains able to meet deadlines and provide the requested additional detail regarding its expenditures, as discussed in PDC's online publications and regulations, in its periodic and other reports to the PDC. WCVAF takes care to file its reports in a timely and thorough manner. The delay in filing the Form C6 referenced in the Complaint was unintentional and inadvertent.

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, reading "Shannon Murphy". The signature is written in dark ink and is positioned below the word "Sincerely,".

Shannon Murphy

President

Washington Conservation Voters Action Fund