

Dmitri Iglitzin (Wed, 11 Dec 2019 at 7:51 AM)

Dear Mx. Blackhorn:

The position of ATULC, which this firm represents, is as follows:

The premise of Mr. Morgan's complaint, which is that ATULC spent money in opposition to I-976 in the context of supporting a legal challenge to that measure, is factually untrue. Other than a pre-election contribution to Keep Washington Rolling on 10-4-19 that was properly reported to the PDC by that committee on a C-3 form, ATULC has at no time spent any funds in opposition to I-976 and, in particular, it has contributed no funds to support the legal challenge referenced by Mr. Morgan. No independent expenditures of any sort have been made by ATULC regarding I-976 and no violation has occurred due to ATULC's failure to report such.

In addition, expenditures made after the date of an election regarding a ballot measure, made by any party, are self-evidently not expenditures made to effect the result of that election and therefore are not expenditures related to a measure "proposed to be submitted to the voters of the state" governed by the Fair Campaign Practices Act. For that reason, even if ATULC had made expenditures related to the post-election legal challenge that has been brought relating to I-976, Mr. Morgan's complaint would still have no merit.

If you have any followup questions or concerns regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

Dmitri Iglitzin, Counsel for ATULC

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