

To Whom it may concern,

First, thank you for commitment to honesty and transparency in campaign financing. In times like these, we are reminded just how important these things are.

Second, thank you for slogging through all 168 pages of “evidence” provided by Mr. Morgan to come up with the two allegations which I am addressing in this email. As to Allegation One: The Committee to Recall Snohomish County Sheriff Adam Fortney is and has always been 100% timely and accurate in filing its C-3 reports. We will happily provide bank statements that correspond exactly with each and every deposit reported to the PDC and thus to the Public.

As to Allegation Two: It is our contention that the Committee, and the subcommittee in charge of arguing our Recall Petition through the legal process, are doing so outside of their official, professional duties. As such, and in agreement with the Sheriff’s legal team, the attorneys referenced in Mr. Morgan’s complaint are doing this work “Pro Se,” or “On Behalf of Themselves.” Therefore, there has not been nor will there be any legal expenses accrued by the Committee. In fact, the Recall Petitioners have been incredibly diligent in ensuring that every party is aware of their “pro se” filing status throughout the legal process. See the attached email for on such example. This email was sent to the Supreme Court Clerk on July 26, 2020 because the Court had been contacting each of the Petitioners via the contact information listed on the State Bar website, as is the Court’s standard practice for obtaining contact information of litigants. Once this was received by the Supreme Court, the contact information was updated for Colin McMahon, Sam Sommerman, Brittany Tri, and Terry Preshaw so that the Court and Fortney’s counsel communicated through the personal email addresses only. Mr. Morgan’s reliance on the “Freedom Foundation case” is misplaced. *State v. Evergreen Freedom Foundation*, 192 Wn.2d 782 (2019) involved a private entity legal services for local initiatives on a pro bono basis. The initiatives were created by Evergreen Freedom Foundation staff and distributed to citizens for filing. Because the Freedom Foundation was providing these legal services to *separate entities*, they were determined to be reportable expenses to the PDC. However, in this matter, there has been no outside drafting, research, argument, or any other type of legal services that has derived from anyone other than the members of the legal subcommittee of the Committee to Recall Snohomish County Sheriff Adam Fortney. Accordingly, the factual and legal analysis of *Evergreen Freedom Foundation*, is distinguishable from this complaint and does not apply. Thank you again for the opportunity to clear this up.

Eric Halvorson

Treasurer, Committee to Recall Snohomish County Sheriff Adam Fortney
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