

Hello –

Thank you for the opportunity to respond to the inquiry regarding violations of RCW 42.17A.235, .240 .

The temporary office space used at Romac Industries was a part-time meeting place and was never an official campaign headquarters. There were vacant offices that were available for meetings and internet use but was not officially assigned to the campaign. The campaign had no employees, several vendors, and a campaign manager that also worked from home, so permanent office space was not required. Some signs and other materials were stored at the location, which is why the candidate made an in-kind payment to Romac for \$280 on 10/08/2020, to cover sign storage and administrative support. Since we believe this was fair market value for use of internet, office space, and some campaign materials storage, reporting it as debt prior to the October report was not required because it was below the \$750 threshold.

The Zoom auction items were presented at what we believed was fair market value at the time, but after the event it was determined that the COVID-19 crisis had decreased the value of vacation items. We believe the properties were reported at fair market value, for the time the items were auctioned off. If the PDC disagrees, we will amend the report.

The in-kind property donation in Montana was reported as the information was presented to the campaign. If the PDC would like us to research further, we are happy to and will amend reports if required.

The auction disclosure dates were discussed with the PDC, prior to filing, on three occasions. Since the COVID-19 crisis did not allow for in-person events, this campaign auction was held online. The items purchased were done so by pledge and future credit card receipts. At the PDC's direction, we initially reported the items purchased as pledges, and the items donated as in-kind, on the pre-primary C4. Once payments were received, we amended the C4's to eliminate the items and filed the auction dates as the time when payments were acquired. Again, we worked with the PDC during this confusing reporting period because the global pandemic has re-written how auction receipts are received.

We are willing to answer any questions and amend any reports to make the expenses more transparent, which has always been the goal of the campaign. Please let us know if any more information is required.