

November 8, 2020

Tabitha Townsend
Compliance Coordinator
Public Disclosure Commission

Subject: PDC - Little, Matthew: Alleged Violation of RCW 42.17A.235, .240 for failure to accurately disclose expenditures; RCW 42.17A.445 for personal use of campaign funds (EY20, Oct20)

PDC case #79287

Thank you for the opportunity to supply complete information and refutation of the complaint made by Glen Morgan.

Listed below are referenced laws with titles for clarity of the accusations.

RCW 42.17A – Campaign Disclosure and Contribution

RCW 42.17A.240(6) Contents of Report (6) The name and address of each candidate or political committee to which any transfer of funds was made, including the amounts and dates of the transfers;

RCW 42.17A.235 Reporting of contributions and expenditures – Public inspection of accounts

WAC 390-16-037 Purpose of campaign expenditures – How to report

WAC 390-16-205 Expenditures by agents and agents' subvendors – How to report

The Little Campaign has reviewed the Glen Morgan complaint that was submitted to your office on October 29, 2020. We appreciate the opportunity to respond. During the relevant period, the Little Campaign filed approximately 122 reports covering approximately \$50,000 in campaign activity. The complaint challenges only a minor aspect of that reporting. More importantly, one of the allegations is completely baseless and other presumed errors were minor and inadvertent. No further action is warranted.

First let me set the record straight as Mr. Morgan has made assumptions that are just not true. I am a first-time volunteer treasurer. I am also the wife of the candidate doing this work in support of my husband and to help keep campaign costs as low as possible. I was not able to attend an ORCA class due to Covid-19, but did attempt to train to the best of my ability through the online instructions provided by the Public Disclosure Commission. Although I may not have read the complete campaign finance laws, I have always attempted to report all contributions, donor information, and expenditures in a way that complies with Washington State Campaign Finance Law. Where I may have made some minor errors or missed some of the details, this was done without malice or any attempt to fool or defraud the public. I am more than willing to adjust descriptions through amendments should the commission determine the need.

We are disappointed that the accuser felt the need to disparage me personally by using the “List of potential witnesses” box on the form as a place to judge this campaign as “very sloppy”.

I will address all accusations individually.

1) Failure to accurately describe expense, and the illegal concealment of required information from the public. (Violation of RCW 42.17A.240(6), RCW 42.17A.235 and WAC 390-16-037, WAC 390-16-205)

PDC Tracking #101011444
C4 – dated 10-26-20
Ravena Strategies - \$5000 – Digital

We reported that the campaign had made a package purchase of digital ads from a consulting company who would then place the ads to fit our time period, location, and target audience. The campaign did not choose ad placement as that was a service provided by the consultant. At the time the invoice was received, the detail information had not been committed. The public was not deprived of knowing the value of the purchase, only the final details of the ads. I will amend this line item with that data that has been recently received.

PDC Tracking #101006097
C4 – dated 10-13-20
ADCO Printing - \$1,074 – Yard Signs
ADCO Printing - \$10,050.97 – Mailers

PDC Tracking #100983102
C4 – no date noted in complaint
Columbia Litho - \$1,147.96 – printed materials
ADCO Printing - \$325.20 – signage
ADCO Printing - \$2,500 - signage
ADCO Printing - \$3,349.26 – signage

The complaint lists 6 examples of the same error. We submit that this was an innocent, minor, and remedial error made by a novice treasurer. All monies were reported accurately and on time and did not materially impact the public interest. In our desire to provide full compliance with the reporting requirements RCW 42.17A, the campaign will immediately make the technical corrections necessary by amending reports to supply quantities and clearer descriptions of signs, mailers, and printed materials.

2) Misuse of campaign funds for personal benefit (Violation of RCW 42.17A.445, WAC 390-16-238(3)(c))

PDC Tracking #101006097
C4 – dated 10-13-20

Rapid Auto Glass - \$259 – Glass replacement

This expenditure was not for the candidate's personal vehicle, but for the campaign manager's personal vehicle. The damage to the windshield happened when carrying 10 foot boards for the purpose of erecting 4' x 8' campaign signs inside the vehicle. No other vehicle expenses were provided for the campaign manager. The campaign felt responsible for this expense as the lumber was solely for the purpose of the campaign. The details will be included in the amended report.

SUMMARY: We submit that the allegations in this complaint are contrived with the purpose of deluding and confusing the public into believing that the candidate willfully attempted to hide critical information. We believe that the items listed as violation #1 are all minor and remedial. We believe that violation #2 is entirely baseless. We have great respect for the Washington Campaign Finance Laws and the purpose of the Public Disclosure Commission. With a clearer understanding of the details of the campaign laws, counts and descriptions can and will be amended on the listed reports along with any other information that the Commission deems necessary. Going forward we will continue to make a good faith effort to comply to the best of our ability and not deprive the public of critical information.

We ask that this complaint be dismissed and the campaign be allowed to make all corrections recommended.

Thank you for your review and consideration.

Paula Little
Treasurer,
Matt Little for Clark County
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