

On Tue, 10 Nov at 4:11 PM , Bruce Ayers <bruce@ayersconsulting.com> wrote:

From: Friends of Bill Bruch for House

Re: Over-limit Complaint Received 11/06/2020 Response 11/10/2020.

Dear PDC,

When we accepted a \$5000 contribution from the Skagit County GOP on 10/14/2020 we were unaware that this last contribution, of many, since the start of our campaign, had exceeded the shared statute limit for contribution from four County Party and Leg District committees in Leg District 10 of \$0.50 per Leg District voter. There had been numerous contributions from the four different organization throughout the campaign dating back to October 30, 2019, almost a year ago. It was not our intent to accept an over-limit contribution.

On October 22, 2020 just eight days after accepting the SCRCP contribution, and prior to receiving any notice or complaint, it was brought to our attention that we may have exceeded the \$0.50 per voter limit shared limit by all four County and Leg District Committees in Leg District 10. I immediately totaled all of the multiple contributions received over the previous year. I discovered, that total contribution did appear to be over the shared \$0.50 per voter limit of \$51,575.00 by \$4,190.00.

I immediately contacted the PDC filings assistances and requested clarification and direction to correct this oversight. After some discussion, and I understand, after a departmental meeting of PDC Staff to clarify the shared over-limit rule, I was directed on October 23, 2020 (Friday) to refund the portion of the Skagit County GOP's 10/14/2020 contribution of \$5000, that had put us over the shared limit. Then to amend our 10/15/2020 C4 and C3 filings accordingly. The specific emailed direction from Alice Fiman, Compliance Officer was as follows:

Friday 10/23/2020

Info from Alice Fiman at PDC

Thank you again for calling. I hope the information below is helpful. Please let me know if you need anything else.

The Recipient of the Over-Limit Contribution (in this case the candidate):

When the recipient of an over-limit contribution issues a refund (on their own or in response to a complaint), they file an amended C-3. Because the receipt of the over-limit contribution is no longer part of contributions received, when the recipient writes a check to refund the over-limit contribution, they do not report the refund on Schedule A to C-4. This ensures the cash-on-hand balance for the campaign will match its bank balance.

The Contributor of Over-Limit Contribution (in this case the Committee):

The committee making the over-limit contribution files an amended C-4. When the political committee making the over-limit, contribution receives a refund of the contribution, the committee deposits the refund, but does not report receiving the refund on a C-3 report. This ensures the cash-on-hand balance for the committee will match its bank balance.

Both Recipient and Contributor do need to make note of these actions in their campaign books of account.

Thank you,

Alice Fiman

Compliance Officer

The following business day (Monday) and again prior to receiving any complaint, on October 26, 2020, I amended the applicable C4's and C3's for both the Friends of Bill Bruch Campaign and the Skagit County GOP in accordance with Compliance Officer, Alice Fiman's direction. The same day on October 26, 2020 I refunded the over-limit amount, using check #193 for \$4,190.00 and deposited the refund check in the Skagit County GOP's bank account. (see attached deposit slip)

I will add that, at no time between the 10/14/20 banked subject contribution and the subsequent 10/27/20 when the refunded \$4,190.50 deposit cleared the Bruch account, did Friends of Bill Bruch's bank balance drop below \$36,234.00 (see attached bank register) therefore none of the over-limit funds were ever used by the campaign.

As you might understand the last two weeks of this campaign were very busy with numerous contributions and expenses. To date this campaign has had 493 separate contributions totaling \$376,788.11. We/I just did not think to add up all of the separate donations from four different committees in Leg District 10 when accepting the final contribution from the SCRIP on October 14, 2020.

It was not my intent, or the campaigns intent, that by accepting the final Skagit County GOP \$5000 contribution on October 14, 2020, to exceed the shared \$0.50 per vote limit in accordance with RCW 42.17A. Upon becoming aware of the over-limit contribution, and without any knowledge of a complaint, I/we without hesitation took immediate action and refunded the portion of the over-limit contribution amount, that had exceeded the limit, in accordance with PDC guidance and direction.

Again, I want to thank Alice Fiman and the filing assistance staff for their timely assistance in helping our campaign to resolve this oversight.

Sincerely,

Bruce Ayers, PDC Compliance Treasurer

Friends for Bill Bruch and Skagit County GOP