

21st Legislative Democrats Mon, 4 Jan 2021 at 11:20 AM To: PDC Support From: 21st Legislative District Democrats Re: PDC Case Number 82111

As instructed, the 21st LD Democrats have reviewed the PDC Case Number 82111 and have prepared our response for your review. Please see attached files (2).

In summary,

The 21st LD Dems disagree and consider the alleged complaint baseless and inaccurate. In addition, the complainant failed to provide any evidence, as described in the response. Explicit 21st LD Dems PDC C3/C4 References are provided in the response, as evidence fully refuting the alleged complaints.

Please see the attached documents.

1. LD21 Dems Complaint Response FINAL Filed Jan 4 2021
2. Complaint (Highlighted) - Two PDC Relevant Items Identified

Please let us know if you have any questions or additional information to bring this matter to a speedy conclusion.

Thank you,

Sharon Holt

21st LD State Committee Member, Butternut PCO



January 4, 2021

PDC Complaint Response to Compliance Department, December 2020, Case #82111

With regard to the two alleged compliance violations made by Mr. Willie Russell, we fully refute the complaint and provide our responses below. We have identified two relevant PDC items.

Excerpts from the complainant are in *italics* below.

ITEM 1: *Ms Holt on Dec 5 2020 used her personal Zoom account to hold the 21st LD reorg mtg. She has used her personal account to hold all meetings of the 21st LD this past year and has excluded elected representatives from attending. Incoming Chair Joel Ware allowed this to continue!*

Response: Due to the Covid-19 pandemic, we began to utilize the already-established personal Zoom account of Chair Sharon Holt, not knowing how long we would be restricted from holding our meetings in person. Chair Sharon Holt offered the use of her account as an in-kind contribution, which is being recorded in our organization's ORCA records with the PDC. Going forward, our organization opened a separate Zoom account dedicated and billed directly to the 21 Dems organization.

ITEM 2: *In March 2019 the 21st LD Cascade Precinct donated \$100.00 dollars and it was never reported to PDC.*

We disagree. The amount in question was properly recorded in our PDC reports as described below.

On March 20, 2019, the organization held a low-cost fundraiser (LCF) at our monthly general meeting by offering tickets for a prize drawing. Mr. Russell had previously collected \$100.00 from members of his Cascade precinct and donated the amount to this event. He did not provide names of the contributors since this was considered an LCF. The total amount raised for the evening was \$166.00, all in cash.

The March 22, 2019, \$166 deposit for the LCF, which included the \$100 referenced in this complaint, was made to our bank account on March 22.

The names of individual LCF contributors are not recorded per PDC requirements.

REFERENCES:

For Item 1:

C4's for Zoom in-kind contribution –

Jun 2020 Entry – ORCA reference #100983503, **C4** for \$99.24, Zoom services Jan thru June 2020

Dec 2020 Entry – ORCA reference #110004412, **C4** for \$102.01, Zoom services Jul thru Dec 2020

For Item 2:

Mar 2019 Entry – ORCA reference 100896174, **C3** for LCF \$166 deposit

CONTACTS:

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Respondent Name
21 st Legislative Democrats
Complainant Name
Willie Russell
Complaint Description
21ldpco (Fri, 11 Dec 2020 at 5:25 AM) unsure as to what description this wants
What impact does the alleged violation(s) have on the public?
Ms Holt on Dec 5 2020 used her personal Zoom account to hold the 21st Ld reorg mtg. She has used her personal account to hold all meetings of the 21st Ld this past year and has excluded elected representatives from attending. Incoming Chair Joel Ware allowed this to continue! In March 2019 the 21st Ld Cascade Precinct donated 100.00 dollars and it was never reported to PDC. The 21st Ld has a history the past 5 years of failing to report. A substantial fine should be levied against those in this party who believe they are above the rules and regulations of the State and continued to harass those who have made complaints previously like Charles Eakins after his complaint.
List of attached evidence or contact information where evidence may be found
March 2019 Lynnwood Library mtg of 21st Ld. Lots of witnesses!
List of potential witnesses with contact information to reach them
Joel Ware Recently elected stated at 12-5-20 mtg that zoom account was Ms Holts and she could regulate who spoke and who didnt! Sharon Holt Micah Rowland Peter Henry Rose Andrews Shaun Olson over 45 folks attended her personal zoom as 21st Dems held Re-org meeting
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.