

January 17, 2022


Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to respond to yet another complaint filed by Glen Morgan (case #102184). We understand this represents the 10th complaint he has filed this month and the 614th complaint he's filed to date with the PDC. Per PDC guidance, we are limiting our response specifically to the questions posed by Tabatha Blacksmith in their email of January 12th, 2022.

1. Based on previous related conversations we have had with the PDC about similar matters, we believe we have reported this in-kind correctly as coming from Melissa Taylor who owns and fully funds 100% of the business discussed in the video linked. We believe, since she is also a board member of the King County Democrats, it was more transparent and accurate to reflect the donation as coming from her rather than her business. If the PDC disagrees, then we are happy to amend that donation.
2. On Monday, February 11, 2019, the PDC sent out an email extending the deadline to Tuesday, February 12, 2019 due to outages. Copy of the email is below:

Filing deadline extension External Inbox x 🔍 🖨 📧

 **WA Public Disclosure Commission** <pdcc@pdc.wa.gov>
to me ▾ Mon, Feb 11, 2019, 11:51 AM ☆ ↶ ⋮

Notice of ongoing outage
Monday, February 11, 2019 - 8:00am to 11:55pm

Correction: The PDC's filing systems are operational, but the agency has received reports of weather-related outages of external systems that may prevent filers from submitting reports. Due to these issues, the PDC is extending the deadline for any reports that are due Feb. 11 to Feb. 12. (An earlier version included the wrong dates.)

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As a result, we believe [this report was filed timely](#) within the extension provided by the PDC in its February 11th email.

3. The difference between the original report filed timely and the amended report is exactly \$14, which is a correction to a fee that was made in the amended month. When we have called the PDC to inquire about how to resolve items like this (uncashed expenditure checks, refunded donations, etc), we have been instructed NOT to enter these corrections on Schedule C reports but rather to go to the original item, delete it (or edit it) and amend all of the reports forward should they impact carryover balances. Often, if a check doesn't

clear the account or a refund needs to be made, it is often outside the 21-day window referenced in the email. It would help treasurers to know how the PDC prefers we handle these things. For example, if a donor asks for a refund many months after an initial donation is made or an expenditure made by check never clears the bank account, would the PDC prefer we amend previous reports (even though it may be outside the 21-day window) or file a Schedule C in real time? The former appears to run counter to the inference in Tabatha's email, although that solution has been advised many times in the past and wouldn't really be a violation of the intent of the law. Or would the PDC prefer we file corrections to the report instead if the issue is outside the 21-day window?

In the current Filing instructions section of the [Candidate Manual online, it has a section on Corrections](#):

Reports should be reviewed before they are filed to make sure the dates, amounts, and other information is accurate. During this review, compare the report to the deposit slip or bank statement and make sure that the amounts match. Correct any discrepancies before the report is filed. The PDC understands that mistakes might happen even when great care is taken, or a campaign may decide to refund a contribution. Efilers will correct the original transaction and refile the report. Because the C-4 reports show cumulative totals, any subsequent C-4 reports must be re-filed. Vendor refunds are reported as adjustments. Step-by-step instructions for corrections and refunds are included in the ORCA software's frequently asked questions.

In the current ORCA FAQs, there is this [question/answer about fixing duplicate expenditures](#):

Changes are not made directly on the forms. You go back to the original transaction to make changes. If you have a duplicate expenditure, return to the transaction to be deleted (Transactions>Expenditures>Monetary Expenditure>Previous) and when you see it in the window, click the red "X" at the bottom of the screen to delete. Now amend the C4 and any subsequent C4's that have been filed.

Please know that we strive to do everything we can to comply with the law and file reports timely and accurately. A recent June 2021 PDC "limited scope" audit of another campaign where we were ministerial treasurers found that:

The Campaign substantially complied with the candidate reporting requirements found in RCW 42.17A and WAC 390, concerning the timely and accurate filing of the Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) reviewed as part of this audit.

- *Documentation provided for selected expenditures as part of the Campaign books of account verified the expenditure information disclosed on the Schedule A to C-4 reports.*

• Practices concerning contribution and expenditure activities and internal control procedures were sound and properly facilitated the timely and accurate disclosure of activities undertaken by the Campaign during the 2020 election cycle.

The exact same systems and protocols for that campaign exist on this committee. We kindly ask that you dismiss this complaint as not having any merit.

Thank you for the opportunity to respond. If you have any questions, please feel free to contact me directly at 206.745.2010 or jason@argo.us.

Sincerely,

Jason Bennett, Deputy Treasurer
King County Democratic Central Committee