

Hello,

Clover Park Citizens for Schools PAC (CP PAC) received the attached complaint from Glen Morgan (Morgan), Complaint 163173, which made the following allegations: (1) Failure to report legally required details on expenditure report; and (2) Fake Vendor information presented to the public and false amounts reported to the PDC for expenditure. The following serves as CP PAC's response to the allegations in Morgan's complaint.

Regarding the first allegation, CP PAC already amended its reports to include the amount of door hangers, yard signs, and posters that it purchased. *See* PDC Report 110262434. CP PAC is a small organization and made a good faith omission, which it immediately fixed. There is no evidence anyone benefited politically or economically from the noncompliance – and CP PAC took on the costs of its ameliorative measures to amend this mistake. An alternative response is thus appropriate under WAC 390-37-061.

Morgan's second allegation claims CP PAC provided insufficient vendor information in PDC Reports 110243466 and 110223879. PDC Report 110243466 accurately listed the recipient of the expenditure, the Public Disclosure Commission, its address, and a description of the expenditure. This expenditure involves CP PAC's prior payment to the PDC as part of the terms of its July 31, 2024, Statement of Understanding with the PDC. While it is true the July 31 Statement of Understanding required CP PAC to make a \$600 payment to the PDC, CP PAC also incurred a \$17.40 service fee when it submitted its \$600 payment via an online portal. For clarity, CP PAC amended PDC Report 110243466 to better indicate that the reported \$617.40 includes the \$17.40 service fee included in the payment. *See* PDC Report 110262437 (clarifying \$617.40 was for "Public Disclosure Commission payment and service fee of \$17.40"). Accordingly, CP PAC provided a sufficient report under RCW 42.17A.240(7) but amended it in a good faith attempt to provide further clarity.

CP PAC is still working on amending PDC Report 110223879 to include the information about individual(s) who received reimbursement from CP PAC. As a result of the Columbia and Umpqua merger, CP PAC's CFO no longer has access to the PAC's Umpqua account. This is causing a delay in amending the reports. We will get back to the PDC on the information regarding PDC Report 110223879 before January 25.

Thank you,  
Juliana DeFilippis  
*Counsel for CP PAC*