

Date: 05/21/2025

From: Jennifer Manchester, Jordan Manchester, Diana Thompson, Mike Cassinelli, and Carol Ham

To: Jennifer Hansen, Compliance Officer, Public Disclosure Commission

RE: Pacific County Democratic Central Comm: Alleged violations of RCW 42.17A.235 & .240 for failure to accurately & timely file contribution & expenditures & RCW 42.17A.320 for failure to include complete sponsor ID (EY24-25 MAY25), per PDC complaint #171641 filed by Conner Edwards on May 1, 2025.

The following statements are submitted in response to the PDC email dated May 7, 2025.

1. Allegation 1: Violation of RCW 42.17A.235 for late submittal of March 2025 C-4.
  - a. Due to unexpected medical needs that arose during travel across the country, our treasurer was out of state for two months and without her access to the PDC campaign finance reporting system for one and a half of those months.
  - b. Our annual fundraiser was held while our treasurer was working with limited access to the PDC campaign finance reporting system, but once she had the option to, she worked hard to make sure that contributions were reported according to deadlines, on daily C-3 reports during that time period.
  - c. Due to the fact that it was annual dues collection time, as well as the complex nature of our annual fundraiser, and having a volunteer treasurer stand-in for the event in the absence of our elected treasurer, our C-4 report 110281711 was submitted late, once our elected treasurer was in Washington state to confirm that all information had been included in the reporting for that time period.
  - d. The entire scenario has highlighted the importance of having a backup treasurer to step up in the case of an absence of the elected treasurer (whether expected or not). We believe that our standard of timely reporting will return to the high level it has been kept at these past few years, and would appreciate your understanding in this unexpected scenario.
2. Allegation 2: Violation of RCW 42.17A.240 for failure to include subvendor name and address info for in-kind contributions.
  - a. There was no location to specifically add subvendor information to the in-kind donations, but we are in the process of gathering the required information and adding it to the report as part of the item description.
  - b. While some of the required information has not yet been collected and added to the in-kind donations listed on C-4 report 110281711, we have amended the report to reflect what we have added presently and it is now report 110286153.

- c. We request an extended response date regarding this specific allegation, in order to get the update completed, and are proposing Wednesday, June 4, 2025.
- 3. Allegation 3: Violation of RCW 42.17A.240 for failure to include run dates for newspaper ad on 2024 21-day Pre-General C-4.
  - a. Report 110252679 was amended to 110286124 with the run dates for the newspaper advertisement.
- 4. Allegation 4: Violation of RCW 42.17A.240 for failure to include number of Harris/Walz signs on 2024 Post-Primary C-4.
  - a. Report 110243787 was amended to 110286125 with the number of Harris/Walz signs listed.
- 5. Allegation 5: Violation of RCW 42.17A.240 for failure to include subvendor info for auction disclosed on C-3 filed 3/18/2025
  - a. While there was no location to specifically add subvendor information to the auction items, clarification regarding subvendor information was added to the item description for each auction item reported in report 110276504, which was then amended to 110286131 with the corrected information.
- 6. Allegation 6: Violation of RCW 42.17A.240 for failure to include accurate occupation listed for donor Kelly Rosenfield on C-3 filed 3/18/2025
  - a. Kelly Rosenfield was contacted, her job title was updated in her contact file, and report 110276504 was amended to 110286131 with the corrected information.
- 7. Allegation 7: Violation of RCW 42.17A/320 for failure to include complete sponsor identification on website
  - a. While the required information has not yet been added to our website, we are in the process of working with our web admin to add "Paid for by the Democrats of Pacific County, PO Box 714, Ilwaco, WA 98624" to the webpage per the RCWs at <https://app.leg.wa.gov/rcw/default.aspx?cite=42.17A.320>.
  - b. We would like to clarify whether the identifying information needs to be listed on the main landing page of the website only, or on all associated pages. Please advise.
  - c. We request an extended response date regarding this specific allegation, in order to get the update completed, and are proposing Wednesday, June 4, 2025.

We are available for further consultation regarding this matter, at your convenience. Please contact Jennifer Manchester at [jenna.manchester@gmail.com](mailto:jenna.manchester@gmail.com) and/or Jordan Manchester at [jordandemspacificcounty@gmail.com](mailto:jordandemspacificcounty@gmail.com) to make arrangements.