

Taki V. Flevaris
taki.flevaris@pacificalawgroup.com

June 30, 2017

VIA EMAILPublic Disclosure Commission
c/o Fox Blackhorn, Compliance Coordinator
fdc@fdc.wa.gov**Re: Alleged violations of RCW 42.17A.235**

To Whom It May Concern:

The Thurston County Democratic Central Committee (“TCD”) appreciates the opportunity to respond to Glen Morgan’s complaint dated May 17, 2017. This latest complaint from Mr. Morgan asserts that TCD “engaged in late reporting/deposit of campaign contributions,” with a spreadsheet listing numerous contributions TCD allegedly reported late. As explained below, the complaint warrants no further action, for three reasons. First, many dates of receipt listed in the spreadsheet are incorrect, and the contributions at issue were in fact reported timely. Second, Mr. Morgan assumes that all items in TCD’s amended reports were not previously reported, which is incorrect. Third, TCD amended its reports in a good faith effort to ensure compliance, and the Attorney General has already brought a lawsuit to address that issue. For these reasons, PDC action on Mr. Morgan’s latest complaint would be unwarranted.

First, many dates of receipt listed in the spreadsheet are incorrect. Based on TCD’s records, the \$25 contributions from Norman Johnson and Judith McNickle listed on p. 2 of the spreadsheet and reported in February of 2016 were received in January of 2016, not 2015. Likewise, a sampling of the contributions listed on pp. 2-3 of the spreadsheet and reported on March 11, 2016, reveals that these contributions were also received in February of 2016, not 2015. The \$250 contribution from Pacific Northwest Carpenters on p. 3 was received in March of 2016, not October of 2015. These contributions were reported timely.

Second, the complaint assumes that all items in TCD’s amended reports were not previously reported. This appears to cover most of the contributions listed in the spreadsheet. In many cases, TCD might have added or changed only one item from a prior report. For the other items listed, the reporting date in the spreadsheet is thus incorrect. These items would have been reported timely.

Third, TCD amended its reports as part of a good faith effort to correct prior discrepancies, and any issues arising from that effort are already the subject of a pending lawsuit

by the State. *See State v. Thurston County Dem. Central Comm.*, No. 17-2-00972-34 (Thurst. Cnty. Super. Ct. 2017). The Attorney General would be expected to amend the State's complaint to include Mr. Morgan's latest allegations to the extent appropriate. For that reason, TCD has given the Attorney General notice of this latest complaint. At the very least, given the overlap in subject matter, no PDC action should be taken until the lawsuit is resolved.

In sum, Mr. Morgan's latest complaint is based on factual inaccuracies and covers the same subject matter as a pending lawsuit by the State. Accordingly, no PDC action is warranted. To whatever extent the PDC has remaining questions or concerns, TCD would be happy to address them.

Sincerely,

PACIFICA LAW GROUP LLP

A handwritten signature in blue ink, appearing to read 'T. V. Flevaris', with a stylized flourish at the end.

Taki V. Flevaris

Attorneys for Thurston County
Democratic Central Committee