

Taki V. Flevaris
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September 8, 2017

VIA EMAILPublic Disclosure Commission
c/o Micaiah Titus Ragins, Compliance Coordinator
pdcc@pdcc.wa.gov**Re: Allegations regarding debt and officer reporting**

To Whom It May Concern:

The Thurston County Democratic Central Committee (“TCD”) has reviewed Glen Morgan’s latest complaint dated August 11, 2017. In the complaint, Mr. Morgan raises questions about TCD’s reporting of legal fees, a venue rental, towing expenses, and a new chair. As explained below, these complaints are either legally or factually baseless, or reflect only a moderate delay in reporting caused by a family medical issue that TCD’s Treasurer has been dealing with in recent months. For these reasons, TCD respectfully requests that no further action be taken on this complaint.

Legal fees. Mr. Morgan insists that TCD must predict, estimate, and report legal expenses as debt. But the fees in question are being incurred on an ongoing, monthly basis, in response to Mr. Morgan’s serial complaints and to resolve a pending lawsuit. TCD could not reasonably be expected to predict and report all such ongoing expenses in advance, which are being reported monthly as incurred.

Venue Rental. Mr. Morgan also calls into question TCD’s payment of \$6,867.35 to Indian Summer Golf Course as “likely” a mere deposit. This amount was for the full rental of the venue, and was properly reported.

Towing Expenses. Mr. Morgan suggests that TCD paid for towing services at three recent events. Two of these events occurred in July; the other was in August. TCD’s Treasurer is in the midst of reviewing records and completing any necessary reporting related to these events. The Treasurer has been delayed due to a family medical issue. In particular, his wife underwent surgery in June and has required his regular attention and assistance in recovery. She has not been able to contribute to the operation of their small business during this period, further increasing the demands on his time and energy. This caused him to fall behind temporarily in

completing some of TCD's reporting. TCD is now coordinating to provide additional support for the Treasurer, who is a volunteer. TCD respectfully requests the PDC's understanding of these recent events and circumstances.

New Chair. Mr. Morgan points out that TCD filed an updated C1 report on August 7, approximately one month after he alleges it was due. Although TCD timely updated its C1 after its past chair vacated the position, TCD acknowledges that its subsequent update to add the new chair was untimely. As above, the Treasurer's recent family medical issue caused this delay. TCD again respectfully requests the PDC's understanding of these circumstances. The election of TCD's new chair was already publicly known, as demonstrated in Mr. Morgan's complaint, and the delay was only approximately one month.

In sum, Mr. Morgan's complaints are either baseless or arise from extenuating circumstances. TCD respectfully requests that no further action be taken on this complaint. TCD would be happy to address any remaining questions or concerns the PDC may have regarding these issues.

Sincerely,

PACIFICA LAW GROUP LLP



Taki V. Flevaris