

To Whom it May Concern --

I am writing in response to the complaint filed against March to Majority (MTM) by Walter Smith.

The complainant makes the allegation that MTM was operating as an unregistered political committee in violation of PDC rules.

As you will see below, this claim is inaccurate. MTM is not a political committee, and those organizing the fundraiser made every effort to comply with PDC regulations.

### Background

MTM was a one time joint fundraiser for the State House members of the greater Spokane area. Legislative Districts 4, 7, 9 and 13 participated in the fundraiser.

I had an accountant open a bank account as required by the PDC.

We made an estimated guess on what the cost of the joint fundraiser would be and asked each of the candidates to share in the costs. This was because fundraising expenses needed to be paid prior to the event. That amount was \$500. So, there was a total of \$4,000 deposited.

Reps. Dent, Dye, Kretz, Manweller, McCaslin, Schmick, Shea and Short contributed \$500 each. I have records indicating this.

At the event, we raised \$11,400. The event qualified as a low-cost fundraiser, and the entry amount was \$25.00.

In total, the event cost \$5000, leaving \$10,400 of net proceeds remaining. After having determined the net proceeds, we divided this amount equally by the 8 participants. The proceeds owed to each candidate was \$1300.

We wrote the check for \$1300 and sent it to Reps. Dent, Dye, Kretz, Manweller, McCaslin, Schmick, Shea and Short.

There was no additional activity by MTM.

### Analysis

According to the PDC:

"Candidates should follow these guidelines when participating in 1) joint fund raising efforts with other candidates... ... open a bank account exclusively for the joint fund raising activities. **This bank account will not be registered with PDC.** All contribution checks are made out in the name of the joint fund raising account. All joint fund raising expenses are paid out of this account. **After expenses are paid, the remaining funds are distributed to all participants on a pro-rated basis. For example, if there are four candidates participating, each receives one-fourth of the net receipts...**" [emphasis added]

(Link: <https://www.pdc.wa.gov/learn/publications/candidate-instructions/contributions/joint-fund-raising-slate-committees>)

As I have described above, MTM followed these guidelines.

If the PDC believes that MTM has not followed these guidelines, please let us know and we will work to fix any errors identified.

Please don't hesitate to contact me if you have any additional questions.

Sincerely,

Mitch Short