

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

WA State Attorney General's Office
PO Box 40100
Olympia, WA 98504

Dear Public Disclosure Commission and WA Attorney General's Office –

Thank you for the opportunity to respond to the complaint filed on Nov 30th by Glen Morgan (case #28239). We kindly request after reviewing our responses that you agree that several of these allegations are patently false.

Below are our quick responses to his claims:

- 1.) Mr. Morgan argues in Schedule A and B that some donations and expenditures were reported late. In reviewing Schedule A, it is apparent that Mr. Morgan is mistaken about the due dates of these reports. Items #2 through 6 were filed timely. The PDC has sent many reminders to treasurers and candidates throughout the campaign years stating that if a filing date falls on a weekend or a banking holiday, that the report is due the next business day.

More specifically:

Allegation 1: The C3 was filed on time: 8/8/16. It was later amended to fix an erroneous deposit date. The software had accidentally set the deposit date the same day as the filing date. We noticed this proactively and fixed it. No material change was made to the report.

Allegations 2-6. The due dates fell on a holiday and weekend, therefore the report was filed timely on the next business day. Please see email from Jennifer Hansen of the PDC affirming this.

----- Forwarded message -----
From: Jennifer Hansen <jennifer.hansen@pdc.wa.gov>
Date: Fri, Jul 1, 2016 at 10:47 AM
Subject: PDC Filing Reminder - Weekly C-3s & 21-Day Pre-Primary C-4
To:

A filing reminder from the PDC for 2016 candidates and their treasurers:

This is a reminder of your filing requirements only. If you have already submitted any of the reports mentioned below, thank you.

Our records indicate that you are registered for the 2016 election and have chosen the "full" reporting option on your C-1 (candidate registration statement).

Beginning June 1, 2016, Cash Receipts (C-3) reports are due weekly on Mondays. This means that any deposit(s) you made during the previous 7 days need to be reported no later than Monday of the following week.

- Any deposits made from June 27th to July 3rd will be due by no later than Tuesday*, July 5th. (The C-3 is due Tuesday because of the holiday.) If there were no deposits made during that time you do not file a C-3 report.
- Any deposits made from July 4th to July 10th will be due by no later than Monday, July 11th. If there were no deposits made during that time you do not file a C-3 report.
- If the candidate's name will appear on the primary ballot your next C-4 will be due Tuesday, July 12th. This C-4 covers activity from June 1st to July 11th and is required to be filed regardless of activity.

SPECIAL NOTE: If the candidate's name will not appear on the primary ballot then your next C-4 will be due Monday, July 11th and cover activity for the entire month of June.

Thank you for timely filing.

Mailed reports are filed when they are postmarked; electronically filed reports are filed when they are transmitted. E-filed reports can be submitted 24 hours a day. Any candidate may e-file contribution and expenditure reports. **expect to spend \$5,000 must e-file their reports.***

Contact PDC staff if you have questions:

Jennifer Hansen
jennifer.hansen@pdc.wa.gov
(360) 586-4560

Chip Beatty
chip.beatty@pdc.wa.gov
(360) 586-0616

3. Each of these examples has subvendor information (where appropriate) included and is filed as directed by the Public Disclosure Commission and recognizing the character limit issues for the description lines. We would also argue that the **suggested language** in the PDC manual around printing items does not apply to small check orders from the bank. We believe, as a result of numerous conversations with the Public Disclosure Commission over the years, that we are reporting accurately the subvendor information for our clients. If the AG's office and the PDC would like to clarify additional reporting requirements (and then increase the character limit or flexibility in line descriptions), we would be happy to work with our software vendor to comply.

4. We believe a newspaper subscription during the election year for a portion of the election year is a legitimate campaign expense and is not for personal use.

Thank you for your opportunity to address these concerns quickly and as thoroughly as possible. We hope you'll consider that this campaign is substantially in compliance and we work very hard to provide timely and accurate disclosure reports to the public.

Sincerely,

Jason Bennett, Treasurer
Committee to Elect Kevin Van De Wege