

[Jeff Upthegrove](#) replied 9 minutes ago (Tue, 25 Sep at 3:10 PM)
to: pdcc@pdcc.wa.gov

Dear Mr. Agina,

In reference to the complaint referenced in your email below: Washington Bike PAC did in fact receive notification from the AGO that no action would be taken by their office regarding the allegations in the complaint.

Our response to the allegations for the purpose of response to the PDC complaint is as follows:

Allegation One, late filing of C3 and C4 reports: We acknowledge that we did in fact file the referenced C3 and C4 reports late. Our failure to file in a timely fashion was the result of the inactivity of the organization and the lack of permanent staff and other resources. We regret these oversights. We would add that the majority of these late reports were for zero financial activity, and the reports that did include some activity did not, in our judgement, have any material impact on the ability of the public or of other campaigns to remain aware of the fund-raising or spending activities of our PAC.

Allegation Two, failure to report debt: We acknowledge that we did in fact fail to report this debt in a timely fashion. Our failure was the result of the fact that we were not aware the debt was incurred until the time of payment. The individual owed the debt had not invoiced the PAC at the time the debt was incurred. We understand this does not absolve us from the requirement to report the debt, but we share this by way of explanation. And we note that we did report the payment as soon as we had the relevant information.

Allegation Three, failure to breakdown expenses: We acknowledge that the two expense payments listed in this complaint did not include information on sub-vendors. This omission was the result of oversight. We regret this mistake. The sub-vendors in these instances were grocery stores from which the reimbursed individuals purchased food consumed at a PAC event. The PAC does have receipts for these purchases available, but no longer has the ability to amend the relevant reports.

In summary, Washington Bike PAC acknowledges having failed to comply with the rules referenced in the attached complaints, and we sincerely regret these oversights. We do however, assert that the failures were not willful nor were they intended to deceive the public, the PDC or any other campaign about the activities of the PAC. As such we do not believe they constituted violations of law, nor do we believe they had any material effect on our obligation to ultimately make accurate and honest reports of our financial activity.

Please feel contact me with any additional questions.

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