

Washington Public Disclosure Commission

February 15, 2018

711 Capitol Way S. #206

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Olympia, WA 98504-0908

Fox Blackhorn, Compliance Coordinator

M. Blackhorn,

I am in receipt of a notification of complaint alleging violations related to RCW 42.17A. Case # 30946.

- Allegation One: Violation of RCW 42.17A.600 for failure to timely register as a lobbyist, or failure to update lobbyist registration within one week of any change, modification, or termination.
- Allegation Two: Violation of RCW 42.17A.615 for failure to timely report lobbying activities.

The complaint filed is somewhat editorial in nature, making assumptions that are misleading and untruthful. I respond to the actual allegations by referring to the codes in which the allegations are based.

Allegation One: I have read RCW 42.17A.600. I have to the best of my ability complied with the law. However, when I review the documents I have filed in the past, I have complied with this statute. Nothing has changed which would require me to change the report already on file at the PDC. If there was any non-compliance, which I don't believe there was, it was unintentional and a good faith technical error in understanding or interpretation of the law, and not an intention to mislead the PDC or the public. However, as I stated, I do not believe there are any errors committed by me under this statute.

All reports I have filed can easily be searched for and found by entering my name on the PDC website. The public has a right to know information regarding contributions made by my employer or myself. In fact, my employer has not made contributions to any candidate or committee, and I have not had any entertainment or contribution expenditures, as can be seen by reading my reports. Expenditures I have reported are related to personally budgeted vehicle fuel, parking fees, and coffee and lunch for myself. I am willing to accept responsibility for errors made in filing and would ask recommendations of the PDC staff in correcting errors and advice on reporting in future reports, if there are any. I am requesting the PDC staff contact me with questions or to allow for an appointment to discuss errors if this is necessary.

I have complied with RCW 42.17A.600. If my reporting has any factual errors or mistakes of a technical or remedial nature, I am willing to take responsibility and request guidance from PDC staff, if necessary, to come into compliance with chapter 42.17A, and correct mistakes I have made. However, I have been unable to discover any mistakes.

Allegation Two: I have read RCW 42.17A.615. I have reported responsibly to the PDC, and my intention in filing reports was to be open and transparent in disclosing my lobbying activities. This can be seen when accessing my reports by entering my name in the search feature of the PDC website, where all reports I have filed can be seen by any member of the public. I have regularly reported monthly to the PDC, indicative of good faith reporting. I have missed reporting deadlines, once because I was out of town, and on other occasions due to serious illness and the death of a close family member, but those

mistakes were immediately corrected within days and the public interest was served in that process. At most, these mistakes were technical or remedial in nature, and long ago corrected, at my own initiative at the time.

Thank-you

Cindy Alia