

FW: RCW 42.17A.765(4) re: (Raise up Washington PAC)

[Phil](#) reported (Wed, 18 Jul at 3:14 PM) via Email

To: pdc@pdc.wa.gov

See below first of two emails to Tony Perkins at the WA AG's office regarding the Glen Morgan complaint against Raise Up Washington.

I will forward the second email momentarily.

From: Phil Lloyd

Sent: Monday, April 23, 2018 4:00 PM

To: 'Perkins, Tony (ATG)'

Subject: RE: RCW 42.17A.765(4) re: (Raise up Washington PAC)

Thank you for the opportunity to respond to the complaint.

With respect to the late reporting alleged by Mr. Morgan, we do not believe that violation number 18 occurred. This was the regular July C4 report and was filed timely. Regarding violations 29 and 30 these were both \$20 recurring donations that were processed in a manner that our staff did not notice of until the bank account was reconciled at the end those months. The C3 reports were promptly filed when the omission was discovered.

The remaining alleged violations appear to all concern amended reports. One was a C3 that corrected a donor name and the remainder are C4 reports that corrected or reported late-received in-kind donations. The committee had a robust system of tracking in-kind donations, but by their nature in-kind donations are more difficult to track since they don't actually run through the committee's bank account.

We worked closely with committee staff and key stakeholder groups, identifying potential in-kind donors, conducting trainings and providing them with in-kind reporting forms. At the end of each reporting period each organization was contacted by email to remind them of the upcoming report. Despite these efforts, we occasionally received reports of the in-kind donations after the filing deadline for the reports. In those cases we promptly amended the affected C4 reports. In all cases I believe that these in-kind donations were from organizations that were already disclosed as substantial contributors to the organization so I do not believe that there was ever a case where a new donor to the organization was disclosed late.

There was no information in the complaint to support allegations Two through Eight so we have no response to provide at this time.

Please let me know if you have any questions or if you require additional information.

From: Phil Lloyd

Sent: Monday, April 23, 2018 12:35 PM

To: 'Perkins, Tony (ATG)'

Subject: RE: RCW 42.17A.765(4) re: (Raise up Washington PAC)

I don't think that would be a problem. I can have someone research these to make sure that they were late.

I do see that the C4 100715299 he claims was due on 7/12/16, but it was for the period 7/1/16 to 7/31/16 so I don't believe that he is correct on that one.

There were also quite a few amended C4 reports where the original C4 was filed timely. I recall that all of these amendments were to report or change information regarding in-kind donations. These can be difficult to track in a timely fashion because they don't run through the committee's bank account. If I could just make a general statement about that that would save us some time.

From: Perkins, Tony (ATG) [<mailto:TonyP@ATG.WA.GOV>]
Sent: Monday, April 23, 2018 12:22 PM
To: Phil Lloyd
Subject: FW: RCW 42.17A.765(4) re: (Raise up Washington PAC)

Phil,

On April 11, 2018, the Washington AGO received the attached citizen action notice from Glen Morgan, alleging disclosure violations by the Raise Up Washington political committee. I'm looking over the evidence supplied and the committee's disclosure filings to assess one allegation in particular, the potential late reporting. From my review, it does appear that some activity was disclosed late.

AGO staff normally asks for written responses to citizen action notices within two weeks, which would be May 7, 2018 in this case. However, I believe we will have an opportunity to discuss this notice before then. I'm hopeful that we could receive a written response from the campaign sooner than the 7th, at least to the allegation concerning late reporting. Can you reply to this email to let me know whether you might be able to furnish a response by this Friday, April 27, 2018?

Thank you for your attention to this. Please let me know if you have questions.

Sincerely,

Tony Perkins

Investigator, Campaign Finance Unit
Washington Attorney General's Office

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