

8/13/18

To: Public Disclosure Commission
Attn: Jennifer Hansen, Compliance Officer

From: Mariah Bettise, (Friends of Mariah Bettise)

Regarding: Complaint Response

I am writing to respond to a complaint filed by Glen Morgan with both the Attorney General's Office and the Public Disclosure Commission.

Thank you to the PDC for instruction that the AGO's office would first evaluate the complaint. The AGO review is complete and the AGO response letter is attached to this email and an excerpt of the content of the letter is detailed below.

RE: Citizen Action Notices filed with the Attorney General Since March 29, 2018 Notice of Results

Dear Mr. Morgan:

Since March 29, 2018, you filed 50 citizen action notices against persons as that term is defined by RCW 42.17A. A copy of the list of those notices is attached for your reference along with the dates of receipt and identification of the 10th day under the notice. The Attorney General's Office completed an initial review of the allegations you made under RCW 42.17A.765(4). You identified that you had previously filed the same allegations in a complaint to the Public Disclosure Commission.

The AGO reviewed your notice and attachments and did an initial review of the allegations. Based on that evaluation, the AGO has determined that the matter should be left to the discretion of the Public Disclosure Commission. Under the recently-passed House Bill 293 8, the State Legislature determined that the Commission and its staff should have the opportunity to review and act on allegations. under RCW 42.17A.

This complaint has now been sent back to the PDC for review and I am responding to the complaint. For context, I am an elected City Council member who was running a first election, Friends of Mariah Bettise campaign, with a team of friend / volunteers helping out. This was the first time running a campaign, which I managed to the best of my ability and understanding. Initially, I did not start the campaign right away. Later in the campaign season, I made a decision to begin a campaign, have volunteers help where they could and accept donations, for the first time.

There are sections of this complaint where I was unclear on the basis for the complaint. However, I've done my best to answer each question to the best of my knowledge and ability, as I understand it. I've responded to each section of the complaint below. Please contact me with any questions.

7) Failure to include sponsor ID

The Friends of Mariah Bettise Website included, the sponsor ID. To the best of my knowledge the campaign website included the sponsor ID.

6) Illegal depositing of campaign funds into bank account by person other than the treasurer or deputy treasurer.

To the best of my knowledge, each deposit made into the campaign bank account was deposited by Mariah Bettise, other than on-line, electronic donations which were deposited directly into the account through 'Democracy Engine'. Again, to the best of my knowledge all deposits were handled correctly.

5) Failure to preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred.

All books, financial records have been preserved and will be preserved for five years. Again, to the best of my knowledge all books and records have been preserved and will be preserved for five years.

4) Illegal unauthorized expenditure of funds by an individual not listed as an officer on form C-1/C1-pc.

There were no expenditures that were not authorized by Mariah Bettise. In addition, Mariah Bettise was the only Officer of the Friends of Mariah Bettise campaign. To the best of my knowledge, all expenditures were authorized by Mariah Bettise, the only officer on form C-1.

3) Failure to list committee officers, timely file/update C-1/C-1PC

I correctly filed my C-1 timely on May 4, 2017 and updated/amended my C1 again on September 12, 2017 to add additional information, per the regulations. In addition Mariah Bettise was the only Officer listed on the C1. To the best of my knowledge C1's were completed correctly.

2) Failure to report last minute contributions.

I am unclear on what this is referencing (in regard to last minute contributions.) To the best of my knowledge the Friends of Mariah Bettise campaign reported all contributions.

1) Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions.

Accurate C-4's and C-3 reports were filed by the Friends of Mariah Bettise Campaign, to the best of my knowledge. The campaign team experienced a reporting and reporting software learning curve as this was the candidate's first campaign and the volunteer's first campaign. In addition, the campaign began later in the campaign season and C-4 reporting (receipts and expenditures) began at that time. The campaign did go back and fill out C-4's at \$0.00 for the months of June, July and August. Even

though there had been no expenditures at that time, the campaign completed the reporting for those months at \$0.00. The C-4 reporting was in process and the campaign team realized we also needed to file C-3 reporting. At that time, the campaign immediately completed C-3's to report all monetary contributions. To the best of my knowledge, the Friends of Mariah Bettise campaign filed all C-3 and C-4 reporting.

Sincerely,
Mariah Bettise



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Campaign Finance Unit
PO Box 40100 • Olympia WA 98504-0100 • (360) 753-6200

June 6, 2018

Glen Morgan
1001 Cooper Point Road, No. 140-222
Olympia, WA 98502

RE: Citizen Action Notices filed with the Attorney General Since March 29, 2018
Notice of Results

Dear Mr. Morgan:

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The AGO reviewed your notice and attachments and did an initial review of the allegations. Based on that evaluation, the AGO has determined that the matter should be left to the discretion of the Public Disclosure Commission. Under the recently-passed House Bill 2938, the State Legislature determined that the Commission and its staff should have the opportunity to review and act on allegations under RCW 42.17A.

Sincerely,

LINDA A. DALTON
Senior Assistant Attorney General

LAD/JDB
Attachment

cc: Aileen Huang, Deputy Attorney General
Respondents
Laura Ewan, Counsel for Respondent
Sarah Derry, Counsel for Respondent
Danielle Franco-Malone, Counsel for Respondent
Dmitri Iglitzin, Counsel for Respondent

ATTORNEY GENERAL OF WASHINGTON

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Will Rava, Counsel for Respondent
Walter Smith, Counsel for Respondent
Elizabeth Petrich, Thurston County Prosecuting Attorney's Office
John Gerberding, King County Prosecuting Attorney's Office
Tim Rasmussen, Stevens County Prosecutor
Mark Lindquist, Pierce County Prosecutor
Tina Robinson, Kitsap County Prosecutor
Larry Haskell, Spokane County Prosecutor
David McEachran, Whatcom County Prosecutor
Mark Roe, Snohomish County Prosecutor
Rich Weyrich, Skagit County Prosecutor
Tony Golik, Clark County Prosecutor
Mark Nichols, Clallam County Prosecutor
Michael Dorcy, Mason County Prosecuting Attorney's Office
Andy Miller, Benton County Prosecutor
Gregory Banks, Island County Prosecutor
Peter Lavallee, Executive Director, Public Disclosure Commission