

Taki V. Flevaris  
[taki.flevaris@pacificallawgroup.com](mailto:taki.flevaris@pacificallawgroup.com)

September 11, 2018

**VIA EMAIL**

Mx. Fox Blackhorn  
Compliance Coordinator 2  
Public Disclosure Commission  
[pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

**Re: Ormsby Campaign's Response to August 23, 2018 Complaint from Glen Morgan**

Dear Mx. Blackhorn:

We represent Representative Timm Ormsby and his campaign, People for Timm Ormsby (collectively, the "Ormsby Campaign"). The Ormsby Campaign takes its reporting obligations seriously and appreciates the opportunity to respond to Glen Morgan's complaint dated August 23, 2018. As explained below, the complaint concerns only a single in-kind contribution to the Ormsby Campaign that was reported timely, albeit with certain innocent and minor errors that have since been corrected.

The Ormsby Campaign timely reported the only in-kind contribution that it received for Pacifica Law Group's legal work, a contribution of \$114 in July. See Report No. 100848640. Contrary to the allegations in the complaint, the Ormsby Campaign did not receive any other in-kind contributions for Pacifica Law Group's work.

Unbeknownst to the Ormsby Campaign at the time, the notice it received for the \$114 in-kind contribution accidentally listed the wrong contributor, the House Democratic Campaign Committee. The Ormsby Campaign recently received a corrected notice indicating that the contribution came from the Harry Truman Fund. The Ormsby Campaign has thus amended its relevant report accordingly. See Report No. 100857939. Initially, the Ormsby campaign also accidentally reported the date of the contribution as July 30, which was the date of the notice itself, rather than July 19, which was the date of the contribution. This minor error has also been corrected. See *id.*

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The primary source of confusion behind the complaint appears to be that the Harry Truman Fund mistakenly reported another, unrelated expenditure as an in-kind contribution to the Ormsby Campaign. See Report No. 100849187. This was an inadvertent mistake that the Ormsby Campaign knew nothing about and that the Truman Fund has since corrected. See Report No. 100855092.

In sum, the Ormsby Campaign timely reported the only in-kind contribution that it received for Pacifica Law Group's work, for a modest amount, and made only innocent and minor errors that it has corrected. No further action is warranted here.

Sincerely,

PACIFICA LAW GROUP LLP

A handwritten signature in blue ink, appearing to read 'T. V. Flevaris', with a stylized flourish at the end.

Taki V. Flevaris