

From: Chris Corry <Chriscorry@outlook.com>

Sent: Friday, October 5, 2018 6:14 AM

To: Fox Blackhorn <fox.blackhorn@pdc.wa.gov>

Subject: PDC - Corry, Chris: Alleged violation of RCW 42.17A.240 for failure to report in-kind contributions for Yakima Junior League event and cups (EY 18; Sep 18)

I have been getting my response bounced back to me. Please confirm you have received our response.

- Chris

Mr. Fox Blackhorn,

The complaint alleges undisclosed campaign contributions, potentially from an employer, and political advertising lacking disclaimers and party affiliation. Complainant alleges violation of RCW 42.17A.240 (Campaign Finance Reporting) and RCW 42.17A.320 (Political Advertising And Electioneering Communications). As these rules apply to **Campaign Disclosures and Contributions**, there is no violation, since Chris Corry's involvement was completely personal (to volunteer and support his wife and a community organization) and professional (to obtain commercial insurance referrals). As outlined below, his participation in the event was entirely unrelated to his candidacy and the election.

Chris Corry is a supporter of the Junior League of Yakima. His wife is an active member in this organization. Supporting his wife, and supportive of the Junior League's mission which promotes community activism, Chris Corry has attended many Junior League events and sponsored multiple fundraisers over the past several years.

For two years in a row (2017 & 2018), Chris Corry and his employer, HUB International, sponsored the Junior League fundraiser EMPOWERS at the \$500 level. In these two instances, HUB paid the sponsorship fee directly. For the 2018 Fashion Front fundraiser, since it occurred in the same calendar year as his previous contribution for EMPOWERS, Chris Corry did not have any HUB corporate sponsor dollars remaining to use as marketing funds. It is usual and customary for brokers to sponsor events as a way to get more business. As such, Chris Corry paid for the \$500 glass level sponsorship out of his personal checking account. The event glass in question (see photographs from complainant) featured various event sponsors in order to thank them for their contributions and to advertise their business. Not only was his sponsorship not paid for with campaign dollars, but also the advertisement on the event glass in no way referenced him as a candidate for public office. His company name "HUB" and logo appeared much larger and directly above his name. Chris Corry is an insurance broker for HUB International. As a broker, his business and commissions are largely driven by referrals. It is customary and expected for brokers and salespersons to advertise their business alongside their name in order to promote their book of business and therefore generate commissions.

As the sponsorship of the glass was in no way related to his candidacy for public office, it was not paid for by campaign dollars, and it did not reference him as a candidate. It is therefore irrelevant to claim the glass should have included disclaimers and party

affiliation. The sponsorship was paid for by him personally to support the Junior League mission and to advertise his business and services as broker at HUB International.

The complainant alleges that Chris Corry used this event as a platform for promotion of his political candidacy. For two years in a row (2017 & 2018), Chris Corry was the event Emcee for the Junior League fundraiser Fashion Front. As the event Emcee, he was provided a script with details about the event participants (clothing stores such as Macy's) and was responsible to introduce the stores prior to their models walking down the runway. The complainant alleges that Chris Corry has no celebrity name recognition and that his involvement as the Emcee is related to his candidacy. Chris Corry enjoys public speaking and has volunteered for many opportunities to support non-profits. In addition to being the Emcee at the prior Fashion Front in 2017, he also has emceed other events such as the SW Rotary in March of this year. His involvement in the Fashion Front event is consistent with his involvement as a personal citizen committed to volunteering and supporting his community. At no point during the event did he reference his candidacy or the election. It is customary for the Emcee's name to be printed in the program and it, again, did not refer to him as a candidate for public office. Prior to, during, and after the event, there was no direct, or implied, reference to anything related to the election or Chris Corry as a candidate.