

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to respond to the complaint filed on July 19th by Glen Morgan. Below are the detailed responses to his claims:

- 1.) The contributions and expenditures in question are the result of the Presidential precinct and county level caucuses. We had several conversations during 2016 with the PDC about the sheer volume of these donations to the 36th District Democrats. As you can see from our reporting outside of the caucus months, our reporting is timely and accurately filed. This was a special circumstance where we worked with the Public Disclosure Commission, specifically PDC Compliance Officer Kurt Young, to deal with the enormous volume of low dollar donations, the tracking of these donations to individual donors, and the accurate reporting of them to the PDC. I take full responsibility of the lateness of these reports as I was not physically able to do a full audit (and amendments of reports) until December. However, while these reports were late, this issue was on the Public Disclosure Commission's radar and the reports were filed per their advice and counsel.
- 2.) Many of these debts are invoices for quarterly or annual fees and are paid when they are invoiced (like the database fee, room rental and meeting space). The Jeff Manson fee paid on 2/10 was reported as a Debt/Obligation on 1/18/17. The Xpress Sign Co invoice was properly reported. These were bumper magnets we ordered for our March membership meeting as a Thank You to our membership. I also believe the Sophia Danenberg reimbursement for a State Committee meeting was accrued/paid in the same month because the quarterly meeting for the State Party happens at the end of a quarter (in this case June 2017).
- 3.) These particular expenses do require additional breakdown. We will amend the reports promptly to include subvendors. As you can see from several of our other reports, we do break down expenses with subvendor information regularly as a practice. These 6 expenses, out of 352 that have been reported since July 2016, represent a small error sample when a majority of expenses have been reported properly.
- 4.) Mr. Morgan's assertion is incorrect. The board members listed on the C1PC form accurately reflect who makes expenditure authorizing decisions on behalf of the committee: the chair, the vice chair and the treasurer.
- 5.) Same as #4. The board members who are listed on the C1PC are accurately reported.

In summary, I take responsibility for the 2016 Presidential caucus-related reports that were filed late. However, I do want to stress that the Public Disclosure was aware of our struggle through this period and was kept apprised of our audit throughout. We worked in good faith and as quickly as we could to perform a full desktop audit of the books for that incredibly overwhelming time period to provide accurate reports.

We'd ask that you consider these mitigating factors as you proceed with your investigation.

Sincerely,

Jason Bennett, 2016 Treasurer
36th District Democrats