

**Island County Democratic Party  
Response to PDC Complaint Filed 6/30/2017 by Glen Morgan**

**July 26, 2017**

To: Fox Blackhorn, Compliance Coordinator, PDC

From: Merri Huffine, Treasurer, Island County Democratic Party  
[icdtres@gmail.com](mailto:icdtres@gmail.com)

Below is our response to the PDC complaint filed on 6/30/17.

Allegation One: Alleged violations of RCW 42.17A.235 for failure to timely report contributions and expenditures. Exhibits A and B were provided by Mr. Morgan.

This allegation is correct. We were late in filing reports.

Late filing was due to repeated difficulties in finding and keeping a Treasurer. There was not good continuity of Treasurer's duties and training.

Plan/Procedures for moving forward:

1. Treasurer keeps a list of our reporting deadlines, and ensures these dates are in the Treasurer's calendar/schedule.
2. Each month the Treasurer will email a copy of our latest ORCA/PDC filing to our Chair. This will confirm that filing has been timely and accurate. As oversight, the Chair will watch for and expect this email each month.
3. As part of the Treasurer's report given to officers each month, Treasurer will again confirm that PDC filing was timely and accurate. Written meeting minutes will reflect this.
4. Designated backup person will file PDC reports in event of the absence/illness of Treasurer. We will keep on file a list of our former Treasurers who have experience with ORCA/PDC filings. If current Treasurer is not available or able to function at reporting time, he/she or the Chair will contact the first person on the backup list.
5. In the event of resignation of a Treasurer, the Chair will immediately appoint one of the backups to serve as Treasurer. Chair will appoint a new permanent Treasurer in a timely manner, so there will be good continuity of duties/training.
6. We have purchased a laptop for exclusive use of the treasurer in filing PDC reports. This will build continuity between successive treasurers, and we will be able to more easily access our past PDC filings.

Allegation Two: Alleged violations of RCS 42.17A.240 and WAC 390-05-295 for failure to timely report debts and obligations. Exhibit C was provided by Mr. Morgan.

With regard to timeliness of reporting, this allegation is correct. We were late in filing reports. See our response to Allegation One above, including our plan for moving forward.

With regard to reporting debts, we did not understand that we had any debt to report.

Our PDC reporting is consistent with common understanding of the word 'debt' which includes the idea that payments would occur over time and/or beyond a 30 day timeframe. In watching the online training provided by PDC, their example of a debt was a contract with a consultant. That makes sense. However, when a vendor has been directly paid timely, within 30 days, we don't see an outstanding debt. Also, in practical terms we often have a reimbursement situation. Reimbursement to volunteers for an authorized purchase could sometimes take time due to delay in getting the receipt into the treasurer's hands; but we paid our volunteers timely after receiving request for reimbursement. The original vendor was paid by the volunteer immediately at time of purchase, so we see no debt there.

We need further guidance and training from PDC, as the RCW is not easily understood in practical terms. Please advise.

Allegation Three: Alleged violations of RCW 42.17A.235 and WAC 390-16-205 for failure to provide detailed breakdowns of expenditures. Exhibit D was provided by Mr. Morgan.

This allegation is correct, with regard to Exhibit D which provides 18 line items of concern. We took the opportunity to review all our C4 entries for 2016 and 2017 and found that in many cases not enough purchase/vendor details had been provided. Corrections to descriptions/details have now been made, and amended C4 forms have been filed.

Plan/Procedures for moving forward:

We will continue to provide detailed breakdowns of purchases and vendors going forward.

Allegation Four: Alleged violation of RCW 42.17A.205 for failure to list all committee officers, in particular Treasurer Brea Wetzel.

This allegation is correct.

Ms. Wetzel was the duly appointed and elected treasurer of the Island County Democratic Party as reflected in meeting minutes of 6/1/16 and our organization's Bylaws, Article IV- Officers, paragraph 4.2: "Officers: The officers of the Central Committee shall consist of a Chair, 1<sup>st</sup> Vice Chair, 2<sup>nd</sup> Vice Chair, Secretary, Treasurer, State Committeeman and State Committeewoman."

Unfortunately on our 2016 C1PC form Ms. Wetzel was listed as Treasurer only in section #5 (Treasurer's name & address), but her name did not appear in section #7 (Committee

officers) because we incorrectly thought she only needed to be listed once on the form. We corrected the error and submitted an amended C1PC form for 2016 on 7/21/17.

Plan/Procedures for moving forward:

We now understand the C1PC form, and will continue to show the Treasurer's name in both section #5 and #7.

Allegation Five: Alleged violation of RCW 42.17A.425 for allegedly allowing illegal unauthorized expenditures of funds by an individual not listed as an officer on C1PC form, in particular Treasurer Brea Wetzel.

This allegation is not correct. Brea Wetzel was authorized to sign checks for purchases authorized by Chair/Executive Board. She was our Treasurer, i.e. also an officer. No unauthorized purchases were made by Ms. Wetzel.

Per our response to Allegation Four above, we were in error by not listing Ms. Wetzel on the C1PC form section #7 as an officer, and this was corrected with the amended C1PC form filed on 7/21/17.

Plan/Procedures for moving forward:

We now understand the C1PC form, and will continue to show the Treasurer's name in both section #5 and #7.

We appreciate the opportunity to respond to this PDC complaint. It has been a learning experience, and we now have a plan for moving forward.

Please contact me if there are any further questions or concerns.

EXHIBIT D Response from Island County Democrats

ORCA Transaction Descriptions Summary

7/26/17

ITEM #	DATE	ORCA DESCRIPTION LINE
1	8/19/16	Reimburse for Clinton campaign signs from 10th LD Democrats; vendor Capitol Press, Olympia.
2	10/31/16	Campaign ad in Whidbey News Times run date 10-26-16.
3	4/4/16	Vendor name is Max Hobbs Political Memorabilia. Description line comments: Buttons & bumper stickers.
4	4/4/16	Split this into 2 transactions for vendor Whidbey Weekly. Description line for \$395 item- Caucus ads run in Whidbey Weekly 3-3-16 & 3-17-16. For the \$240 item- Envelope print job.
5	7/27/16	Reimburse for Clinton campaign signs from 10th LD Democrats; vendor Capitol Press, Olympia.
6	5/5/16	Reimburse, office supplies purchased at Office Max, Walmart, Michaels & Staples. See Memo.
7	8/27/16	Reimburse for payment of print job; campaign flyers from Office Depot.
8	4/4/16	Check voided. See Memo/explanation for checks #943, 946 & 951.
9	12/2/16	Reimbursement for purchase of election night party supplies at Costco.
10	4/4/16	Reimbursement for caucus supplies purchased at Walmart & Office Max.
11	4/4/16	Related to item 8 above. Check #943 paid \$175 to Stanwood Camano School District for use of School District space for caucus. See Memo.
12	5/24/16	Reimbursement for convention supplies purchased at Office Depot, Haggen, & Papa Murphy,
13	10/27/16	Clinton campaign signs, printed by Capitol Press, Olympia, WA.
14	5/24/16	Reimbursement for purchase of convention supplies at Office Depot.
15	10/24/16	Reimbursement for brochure print job at Office Depot.
16	8/20/16	Campaign ad run date 7-14-16.
17	8/19/16	Reimbursement for food purchased at The Goose Community Grocer, for SummerFest event.
18	8/20/16	Reimbursement for office supplies purchased at Office Depot.