

May 5, 2017

Washington State Public Disclosure Commission

Attn: Fox Blackhorn

PO Box 40908

Olympia, WA 98504-0908

Dear Mr. Blackhorn:

We received your email on May 1<sup>st</sup> regarding a complaint by Mr. Glen Morgan alleging various violations to PDC rules. Thank you for the opportunity to respond. Our point by point response is as follows:

- 1) The committee's C1 registration was amended in January of 2014 to re-register for the 2017 election cycle. We did not regard this as new registration so did not require an additional C4 to be filed for 1/1/14 to 1/6/14. Please advise if we were mistaken as to the filing requirements of an amended registration statement.
- 2) A) As the committee nears the 2017 election, we undertook a detailed review of our accounting practices and discovered that credit card fees were not being recorded until the bank account was reconciled at the end of the month, after the filing of the previous month's C4. Now that contribution volume is increasing, these fees are becoming more substantial so we elected to amend previous reports to include these and will change our accounting practices to include these as debts on future reports. The referenced C4 was promptly and properly amended.  
B) Lawrence James of Vashon Island, WA did in fact donate to the committee twice. This C3 is accurate.
- 3) Ms. Wyckoff did report her employer/occupation to the committee as "Self-employed Farmer". We had no involvement in identifying her employer/occupation and no reason to question this at the time it was reported to us. Also see attached a document that we obtained from a Google search for "Martha Wyckoff" that clearly indicates that she is (or was in 2014) a farmer.
- 4) We have performed a review of each of the "unreported debts" on Mr. Morgan's complaint. Though he does not elaborate on why these debts should have been reported, a review of our filings shows that the great majority of these expenditures were either a) expenses incurred in the current period, b) were pre-payments of future expenses or c) were actually reported as debts. It appears that he simply printed a list of all of the committee's expenditures and claimed that they were all unreported debts. Note from our response to item 2) that we agree that credit card fees that debit the account in the next month should

be reported and we have changed our internal procedures with regard to recording and reporting these as debts for the prior month.

- 5) We do not see a file labeled "Constantine Illegally disguised secret expenses". Please provide this to us if you are able. We don't see anything described that way on the PDF that you sent by email. We do not believe that the campaign has any "secret" or "disguised" expenses.
- 6) Mr. Constantine attended a meeting of the Spokane Democrats for fundraising and to gain general support for his King County Executive campaign and purchased a program advertisement. We are not aware that there are any statutory (e.g. geographical) limitations to how a candidate can spend campaign funds so long as the campaign believes that there is a benefit to the campaign. This is also true for the WS Democrats expenditure. Mr. Constantine attended an event and was asked to pay for admission. We believe that both expenditures provided a substantial benefit to the campaign.
- 7) We do not, as matter of policy, have our vendors approve expenses. None of the vendors listed had the authority to authorize expenditures on behalf of the committee. And all strategic and policy decisions of the committee are ultimately made by the candidate. We do not believe that people merely making spending or policy suggestions should be listed on a candidate's C-1
- 8) Mr. Morgan provided no evidence supporting his "belief" that these vendors illegally authorized expenses. Also see response to item 7 above. None of these vendors were committee officers and therefore no unauthorized expenditures were made.
- 9) We were not provided a file labeled "Constantine Illegal Personal Use of Campaign Funds". Please provide this file if you are able, but know that we know of no instance where Mr. Constantine used campaign funds for personal purposes.
- 10) The expenditure to Northwest Progressive Institute was for an event sponsorship that had advertising value to the campaign and from the candidate's appearance and speech at the event.
- 11) We were not provided with a file labeled "Constantine illegally hidden surplus funds expenditures". Please provide a copy of this file if able. We do see a list of Surplus Funds expenses attached to the complaint, each suggesting a deficiency in reporting sub-vendors. We believe these were properly reported. Please advise if the sub-vendor disclosure is required for payments from Surplus Funds. We will amend reports as is appropriate.

- 12) The candidate inadvertently did not check this box and will amend the F-1 in question to check the appropriate box.
- 13) The candidate inadvertently did not list his PERS account and will review his F-1 filings and make amendments as appropriate.
- 14) Sound Transit is a governmental agency (a Regional Transit Authority) and its Board is required by statute to be composed of public officials, with County Executives playing a prominent role. Thus, we don't believe that it is a "corporation" or "entity" of the kind that requires conflict disclosure in Box 5 of the F1.

Thank you for the opportunity to respond. Please contact the undersigned if you have any questions or if you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Lloyd', with a large, stylized loop at the end.

Philip Lloyd, Treasurer  
Friends of Dow Constantine

# Teanaway Community Forest



## Teanaway Community Forest Advisory Committee Current Membership

- **Gregg Bafundo** of Tonasket, representing Trout Unlimited. He also serves as co-chair of the Washington Backcountry Hunters and Anglers, and is a member of the Traditional Bowhunters of Washington and the WDFW Game Management Advisory Council.
- **Dale Bambrick** of Ellensburg, a professional fish biologist, who has participated in outdoor recreation opportunities in the Teanaway Valley for many years. He has 28 years' experience working in the Yakima Basin and is a member of the Washington Water Trust board of directors.
- **Gary Berndt** of Ellensburg, Kittitas County District 2 Commissioner. A resident of Kittitas County for 40 years and a former Cle Elum mayor and city council member, he worked for DNR from the early 1970s through 2011.
- **Mark Charlton** of Ellensburg, representing the Kittitas County Farm Bureau, of which he is president. He has worked with counties, cities, tribes, and other groups to promote restoration projects in the Teanaway.
- **J.J. Collins** of Roslyn, chair of Kittitas Chamber of Commerce economic development committee and Forterra board member. He is a member of the Urban Land Institute and the board of advisers to the Central Washington University College of Business. He fishes, hikes, and bicycles in the Teanaway.
- **Kitty Craig** of Seattle, representing The Wilderness Society. A land use planner, she also serves on the lands subcommittee and outreach committee of the Yakima Basin Integrated Plan.
- **Brian Crowley** of Woodinville, representing the Evergreen Mountain Bike Alliance. He owns property near the community forest and participates in fishing, hiking, trail maintenance, and mountain biking in the forest.
- **Jeri Downs** of Cle Elum, a second-generation farmer in the Teanaway Valley. A retired teacher, Downs has farmed, grazed cattle, managed forestland, and engaged in many forms of recreation in the Teanaway Valley.
- **Reagan Dunn**, a member of the King County Council, who owns property near the southern boundary of the Community Forest. He is a member of several outdoor recreation and conservation groups, the Swauk-Teanaway Grange, Friends of the Teanaway, and the Mountains to Sound Greenway Trust advisory committee.
- **Urban Eberhart** of Ellensburg, representing the members of the Yakima Basin Joint Board, which includes the City of Yakima and several irrigation and reclamation districts, and the executive committee of the Yakima Basin Integrated Plan. He has worked on Yakima Basin resource issues for more than 30 years.
- **Deborah Essman** of Ellensburg, president and representative of the Kittitas County Field and Stream Club. She is the treasurer of the Kittitas County Chamber of Commerce and a member of the Kittitas Environmental Education Network. She hunts, fishes, rides horses, and pursues photography and bird-watching in the region.
- **James Halstrom** of Ellensburg, a founding board member of Friends of the Teanaway. He is a member of Swauk-Teanaway Grange and the Washington State Horticultural Association. He participates in horseback riding and trail restoration in the Teanaway.
- **Andrea Imler** of Seattle, representing the Washington Trails Association. An active hiker, mountain biker, and camper, she also has been involved in communication and outreach for the Yakima Basin Integrated Plan.
- **Wayne Mohler** of Cle Elum, an engineering and project management consultant, representing the Washington State Snowmobile Association.
- **Mike Reimer** of Sumner, representing families and off-road vehicle (ORV) interests. He is a small business owner, avid outdoorsman, enjoys mountain biking, and frequently visits the Teanaway. (Appointed in July.)
- **Jason Ridlon** of Thorp, representing the Back Country Horsemen of Washington. He has ridden, fished, bicycled, and hunted in the Teanaway area and has worked in the logging industry in the region.
- **Phil Rigdon** of Toppenish, deputy director of the Yakama Nation Department of Natural Resources.
- **Derek Sandison** of Wenatchee, director of the Office of Columbia River for the state Department of Ecology.
- **Doug Schindler** of Preston, representing the Mountains to Sound Greenway Trust. He is a past president of the Washington Trails Association, and has hiked, camped, and ridden horses in the Teanaway.
- **Martha Wyckoff** of Cle Elum, a neighbor of the Community Forest and a family farm landowner for 25 years. Member and former national board member of the Trust for Public Land; member of the Swauk-Teanaway Grange and Friends of the Teanaway.