

March 31, 2017

Evelyn Fielding Lopez  
Executive Director, Public Disclosure Commission

Dear Mr. Lopez,

I am responding to PDC complaint # 15776 filed by Mr. Glen Morgan against Jay Manning, in his capacity at Cascadia Law Group. I am the Government Affairs and Policy Specialist at Cascadia Law Group and as such, assisted in filing and signing most L-1 and L-2 forms associated with our work at Cascadia Law Group in 2015.

This letter is sent in response to a complaint filed by Glen Morgan alleging noncompliance with certain filing requirements imposed on persons engaged in "lobbying." A copy of the complaint, which was filed with the Public Disclosure Commission (PDC) on March 20, 2017 is attached. Mr. Morgan's complaint raises three allegations, and each is responded to in turn below.

(1) Failure to timely submit monthly lobbyist expense (L2) reports.

Mr. Morgan notes that state law requires lobbyists file regular, timely, and accurate lobbying expense reports (L2s) with the PDC, even if no expenses have been incurred. He notes that reports for the previous month are due on the 15th.

I submitted reports for Cascadia Law Group in 2015 for one client, Net-0 Consulting.

I was the lead at Cascadia Law Group for this client and lobbied in that capacity during the 2015 Legislative Session. I was new to lobbying and was learning- with much assistance from PDC staff- about L-1s, L-2s, and L-3s required by state law. In 2015, I communicated with the PDC regularly. In fact, I even had to amend my initial January and February filings in March because I had not relisted the total amount for lobbying in the correct column. I mention this to demonstrate my commitment to communication with the PDC throughout 2015.

Mr. Morgan sites 4 instances where he alleges we were "well past the statutory deadline" for filing on the 15th. They are:

- 1) Reports for January- (submitted February 17th)- 15th on a Sunday
- 2) Reports for May- (submitted June 16th) 15th on a Monday
- 3) Reports for July- (submitted August 18th) 15th on Saturday
- 4) Reports for October- (submitted December 15)

It is correct that my filings for the months of January, May and July were submitted 1-2 days past the 15th. In two instances, the 15th occurred on a weekend and I submitted the following Tuesday. In one instance, I submitted one day past due.

I take responsibility for these 1-2 day late filings. However, I would hardly say they are "well past the due date" as Mr. Morgan claims, and it is not evident that my tardiness in these 3 instances caused any inability for the PDC to review my L-2 reports and file them.

I filed the October and November L-2s in December 2015. By October we were not working at all for this client and not receiving any compensation- a necessary trigger as I understood- for filing L-2s.

I was not aware that I was to file \$0s for this period. After speaking with the PDC staff by phone, I was made aware that we needed to continue to file L-2s monthly, but list \$0 compensation. We reported \$0 for the last three months of 2015 at the recommendation of the PDC. We terminated our registration in 2016 because we were no longer working with this client.

(2) Failure to disclose time spent lobbying state agencies, failure to accurately disclose the subject matter of lobbying.

Mr. Morgan notes that we listed a range of 5%- 30% of the time lobbying the legislature in any given month. He notes we did not disclose any time spent lobbying state agencies- which he cites as a violation.

He notes that 30% is not 100% and that "by deduction", one can assume that the remainder of time not listed was spent lobbying state agencies. We did not spend time lobbying state agencies- or rather- did not spend time that would be in excess of 4 meetings, enough to trigger any associated reporting. Mr. Morgan also notes that we did not list expenses associated with lobbying state agencies. This is because no expenses were ever incurred.

I was instructed by PDC staff that one should only list an estimated percentage of time spent on lobbying, as other time may be spent on non-lobbying activities- such as research, preparing information, creating education materials or engaging other stakeholders. This is especially true in situations like ours, as we are not for hire contract lobbyists. As instructed, I listed the estimated percentage of time for each month when direct lobbying of the legislature, or any contact made with members of the legislature occurred, the remainder of time was spent on non-lobbying activities.

3) Failure to provide a photograph and information.

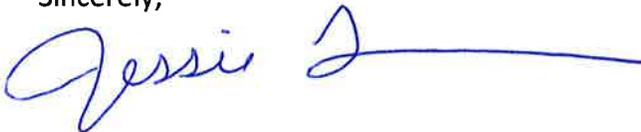
Mr. Morgan notes that I did not submit a photograph or short biography for myself or Jay during 2015.

Many registered lobbyists on the PDC lobbyist pictorial do not show photos or biographies. Before submitting our L-1 for 2015, and officially registering with the PDC, I had many conversations with PDC staff. I was never told that not having a photo or biography was a violation, nor was I ever asked to correct their absence. If the PDC desires, we will submit both a photo and a short biography retroactively.

I have tried to answer Mr. Morgan's complaints honestly and accurately. As stated before, in 2015 I was new to the PDC filing process, and I acknowledge I made some minor mistakes. I communicated with and relied on PDC staff to help me through the process to submit information accurately, timely and in the format desired. I thank the PDC staff for all their help and assistance.

We hope that this response meets the PDC's needs for investigating this complaint. Please don't hesitate to contact me with further questions or clarifications.

Sincerely,

A handwritten signature in blue ink that reads "Jessie Turner". The signature is written in a cursive style with a long horizontal line extending to the right.

Jessie Turner  
Policy and Government Affairs Specialist, Cascadia Law Group