

March 21, 2017

To: Evelyn Fielding Lopez

RE: PDC - Wilson, John - Alleged violations of RCW 42.17A

Ms. Lopez,

Below are responses to the 10 complaints that were recently filed against the John Wilson for King County Assessor campaign. Please let me know if you have any questions.

Thank you,

Tom Perry
Treasurer

1. We don't believe that buying a domain name makes a person a candidate. People buy domain names all the time to protect their name, plan for the future, etc. If John thinks he might run for governor someday, and wants to make sure he owns Wilson4Governor, that doesn't make him a candidate for governor now.
2. Since the domain name was not an in-kind, there was no reason to file a C4 report on the day the C1 was filed. Additionally, the PO box was paid for by Tom Perry, and a reimbursement invoice was presented on 4/11/15, with payment being made on 4/12/15.
3. Best efforts were made to find occupations and employers. I have been told by PDC staff that missing a few here and there is acceptable. These missing four represent 2.5% of the donors over \$100.
4. To address A, B & C:
 - a. A purchase from the Hardware Store Restaurant on 10/26 appeared in online banking as \$16.29 on 10/27, the day the C4 report was due. Later on the amount changed to \$19.29 in online banking to reflect the \$3.00 tip that was added. This change was discovered before filing the November C4, and was amended on 12/10/15.
 - b. A purchase from Amber Seattle on 10/12 appeared in online banking as \$158.60 on 10/13, the day the C4 report was due. Later on the amount changed to \$178.60 in online banking to reflect the \$20 tip that was added. This change was discovered a few days later and the report was amended on 10/20/15.
 - c. This occurred due to the fact that I was told in June that there was no primary election since only two candidates were on the ballot. Originally \$1900 came from Michael Grossman (\$950 for each election). When we found out there was no primary, we got permission from Michael Grossman's spouse (Michele Sharar) to attribute the extra \$950 to her. This happened in June, which is why we amended the 3/30 C3 report then.

5. These expenses were all incurred in the period that they were reported, and therefore did not need to be reported as debt. For example, Amber Seattle for \$283.40 occurred on 11/19/15, and was reported on the 11/30 C4 report. Also, Overnight Graphics for \$796.65 occurred on 9/30, and was reported on the 10/12 C4 report. I think Mr. Morgan doesn't fully understand what is considered debt.

Regarding all the regular consulting expenses to Campaign Compliance Solutions, Stober Solutions, and McKenna Hartman, it is our understanding that there is no requirement to list recurring expenses as future debt (such as payroll, which this is similar to).

6. All of these expenses have descriptions. Some are more detailed than others, but I have never seen a complaint about descriptions like these. For many of these it is unreasonable or impossible to list more details. "Online advertising" on Facebook is continuous. "Audio visual equipment" and "Royalty-free audio" is clearly for producing advertisements. For some of them, the name of the vendor makes it obvious what the expense was for. For example, the "Event fee" to the Northwest Progressive Institute is clearly for an event put on by the Northwest Progressive Institute. For parking reimbursements, there were multiple parking locations, some with no vendor identification.

We stipulate that some of these expense descriptions could have been more detailed, and we will work to provide better descriptions in the future.

7. These three expenses were for events such as dinners or luncheons that John attended. They were all reported as "event fee". Campaigns do this all the time. The campaign paid for the cost of attending an event where John appeared as a candidate.
8. Tom Perry is listed on the C1 as the Treasurer. He is also listed as performing ministerial duties only because he did not make any expenditure decisions.

Bailey Stober is not listed as an officer because he was not making expenditure decisions. He consulted with the candidate, and performed the various day-to-day functions of running the campaign as he was instructed.

9. Since Tom Perry and Bailey Stober were not officers, they did not illegally authorize expenditures.
10. To address A & B:
 - a. Regarding mailers to registered voters, these lists are available free of charge to everyone, so no in-kind needed to be reported. Fundraising letters were sent by McKenna Hartman Consulting, and the lists she used were included in her fee.
 - b. The photograph used was a professional photo that the candidate had done in the past, and he had purchased the rights to the photo. Since it was his personal photo we didn't believe we needed to report it as an in-kind donation.