

To Whom It May Concern –

I write in response to the complaint filed against me on Dec 30 2016. Most of the violations alleged in the complaint are erroneous, and a few are very minor oversights. I will address them all here.

1. With one understandable exception, all the expenditures listed here are legitimate expenditures under RCW 42.17A.430.
  - a. The \$200 contribution to the Industrial Areas Foundation NW was an error in that IAFNW is not registered under RCW 19.09. The intent of this contribution was to help in closing out the debt of Sustainable Works, an organization which was registered under 19.09, but was no longer able to accept contributions due to being in receivership.
  - b. The \$63.88 expenditure was to acquire checkbooks for this account, which was a necessary expense in order to make other disbursements from the account.
  - c. The computer is a nonreimbursed public office-related expense per RCW 42.17A.430(7).
  - d. My 2015 trip to Denmark and Sweden was a study mission to learn about Danish and Swedish climate, clean energy, and environmental policies. I helped organize the trip and eight other Washington state legislators attended. As chair of the House Environment Committee, studying environmental policies in other jurisdictions is very much necessary for my legislative work, and this trip clearly meets the definition of a nonreimbursed public-office related expense subject to RCW 42.17A.430(7).
2. Jay Petterson is clearly listed as my treasurer on my C1. He does not authorize expenditures or make decisions on my behalf. All expenditures are authorized solely by me. As such it would be erroneous to list him as a committee officer.
3. I fail to follow the complainant's logic regarding why my payment to the 34<sup>th</sup> District Democrats for advertising in their sample ballot is not an authorized expenditure. The advertisement did not "run" on a specific date as it was distributed to Democratic precinct committee officers in the 34<sup>th</sup> district for distribution throughout the election cycle.
4. The period of greater than two weeks between the closure of books for the 2014 campaign and the filing of my 2016 C1 is an exceptionally minor issue, even by the standards of this complaint.
5. The PDC has made it clear that vendors such as ministerial treasurers, fundraisers, salaries, and rent are reported as debts/obligations for the month they accrued if not paid in that reporting period incurred – not for the entirety of the campaign cycle. If that were the case then every campaign's first C4 report would include many tens-of-thousands of dollars of debt before a single dollar had been raised.
6. All over-limit contributions have been refunded.
7. I did forget to check the box on my 2016 F1 indicating that I am a current state elected official and that I am familiar with RCW 42.52.180. I regret the oversight but I am quite familiar with RCW 42.52.180 and its prohibition on use of public resources for political campaigns. I checked the box on all my previous F1s and have amended my 2016 F1 to correct this oversight.

I respectfully ask that you dismiss Mr. Morgan's complaint, as previous guidance from the PDC as well as the inaccuracy of his claims render the complaint without meaning.

Thank you for your attention. Please let me know if I can provide any more information that would be of use in resolving this complaint.

Joe Fitzgibbon