



State of Washington

**PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

**Memorandum to File**

To: The Reagan Fund, PDC Case 9343

From: PDC Staff

Subject: Meeting Materials for December 7, 2017 Commission Meeting  
Signed Stipulation to Facts, Violations and Penalty

NOTE: On Tuesday, November 21, 2017, PDC staff received an email from Mark Lamb, legal counsel for The Reagan Fund, in which he attached a PDF document containing a copy of a signed Stipulation to Facts, Violations and Penalty for The Reagan Fund.

The attached PDF document submitted by Mr. Lamb, inadvertently omitted page 4 which contained the signature block for Mr. Lamb as legal counsel and a representative for The Reagan Fund.

Mr. Lamb is currently unavailable to resend the signed Stipulation to Facts, Violations and Penalty for The Reagan Fund, but staff will provide a copy to the Commission prior to the December 7, 2017 Commission meeting, and post a copy on the PDC website as part of the Commission meeting materials as soon as one becomes available.



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Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action  
Against

The Reagan Fund

Respondent.

PDC Case 9343

Notice of Administrative Charges

**I. Jurisdiction**

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state's campaign disclosure and contribution law; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

**II. Allegations**

2. PDC staff alleges that The Reagan Fund, a political committee registered with the PDC violated RCW 42.17A.235 and 42.17A.240 by failing to timely disclose \$84,640 in expenditures for contributions to political party organizations and political committees and expenditures for political advertising, surveys and research, and get-out-the-vote telephone calls.

**III. Facts**

3. The Reagan Fund (TRF) is a political committee registered with the PDC, with ties to the House Republican Organizational Committee (HROC), a caucus political committee made up of Republican members of the Washington State House of Representatives. TRF has been registered and reporting with the PDC since March 8, 2007.
4. TRF and HROC share staff, office, and overhead costs, and are related political committees.

5. In 2016, TRF made expenditures to HROC for overhead and staffing costs, contributions to political party organizations and to political committees making independent expenditures and electioneering communications in support of Republican legislative candidates, and contributions to candidates for State Representative.
6. On October 9, 2015, TRF filed an amended Committee Registration (C-1pc report) registering as a Continuing "Other" political committee, and listing Army Davis as COO-CFO, and Andrew Aboen as Treasurer. The amended C-1pc report filed by TRF was in effect throughout the 2016 election cycle.
7. On September 12, 2016, TRF timely filed the 2016 Post-Primary Election C-4 report covering the period of July 26 through August 31, 2016. The C-4 report disclosed TRF received \$348,550 in monetary contributions and made \$16,163 in expenditures that included a \$10,000 contribution a political committee making independent expenditures during the 2016 election, and seven expenditures for Facebook advertising totaling \$4,417. No additional expenditures were disclosed on the 2016 Post-Primary Election C-4 report filed by TRF.
8. PDC staff reviewed the complaint filed against TRF on October 25, 2016, alleging that TRF failed to disclose a \$10,000 contribution made to the King County Republican Central Committee (KCRCC). Staff reviewed the 2016 C-4 reports filed by TRF, and queried the PDC expenditure database for TRF expenditures for the 2016 election cycle, but could not find that the \$10,000 contribution to the KCRCC had been disclosed on any C-4 report as an expenditure prior to the complaint being filed on October 25, 2016.
9. While staff was reviewing the HROC complaint and the C-3 reports filed by the seven candidates and the Washington State Republican Party (WSRP), staff became aware that one of the contributions listed in the HROC complaint, a \$10,000 monetary contribution to the Washington State Republican Party (WSRP), had been disclosed by the WSRP as coming from TRF.
10. In addition to the KCRCC contribution, staff could not find that the WSRP contribution had been disclosed by TRF.

11. On October 28, 2016, TRF filed an amended 2016 Post-Primary Election C-4 report, which included the previously reported \$348,550 in monetary contributions received and \$16,163 in expenditures made, but also disclosed \$84,640 in previously unreported expenditures.
12. The \$84,640 in new expenditures included contributions to political party organizations and political committees, for political advertising, surveys and research, and get-out-the-vote telephone calls (GOTV), and were disclosed by TRF 46 days late, and 11 days prior to the November 8, 2016 general election being held.
13. The late reported expenditures disclosed by TRF including the \$10,000 contribution to KCRCC and the \$10,000 contribution to WSRP discussed above, were as follows:

HROC Expenditure to Candidate/Committee	Date Expenditure Made	Amount	Date C-4 Due	Days Late
Sermo Digital (Online advertisements)	7/28/2016	\$ 15,000	9/12/2016	46
Ron Hill (August rent)	7/28/2016	\$ 349	9/12/2016	46
Community Progress PAC	7/29/2016	\$ 4,500	9/12/2016	46
Dialing Services (GOTV Live calls)	8/5/2016	\$ 2,912	9/12/2016	46
Snohomish County Republican Party	8/5/2016	\$ 2,500	9/12/2016	46
King County Republican Central Committee	8/9/2016	\$ 10,000	9/12/2016	46
Fallon Research & Communications (Surveys: Leg Districts 5 & 17)	8/5/2016	\$ 29,000	9/12/2016	46
WSRP Exempt Funds account	8/11/2016	\$ 10,000	9/12/2016	46
Lisa Fenton (reimburse mileage)	8/17/2016	\$ 369	9/12/2016	46
Dan Kristiansen (reimburse for travel)	8/25/2016	\$ 1,860	9/12/2016	46
Sermo Digital (website hosting)	8/26/2016	\$ 150	9/12/2016	46
Fallon Research & Communications (Survey LD 17)	8/30/2016	\$ 8,000	9/12/2016	46
<b>Totals</b>		<b>\$ 84,640</b>		<b>46</b>

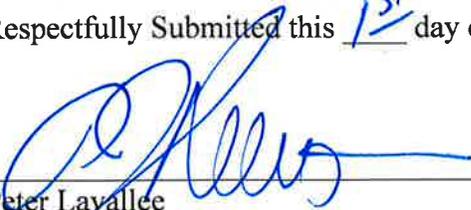
#### IV. Law

**RCW 42.17A.005(37)** states that "Political committee" means any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition."

**RCW 42.17A.235** and **RCW 42.17A.240** requires political committees, including caucus political committees to file timely, accurate reports of contributions and expenditures, including monetary contributions made to candidates, and bona fide political party organization.

C-4 reports are required to be filed 21 and 7 days before each election, and in the month following the election, regardless of the level of activity.

Respectfully Submitted this 15<sup>th</sup> day of November, 2017.



\_\_\_\_\_  
Peter Layallee  
Executive Director



State of Washington

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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH  
RCW 42.17 and RCW 42.17A

The Reagan Fund

Respondents.

PDC Case 9343

Report of Investigation

I.

**Background. Complaint and Allegations**

- 1.1 The Reagan Fund is a political committee registered with the Public Disclosure Commission (PDC), with ties to the House Republican Organizational Committee (HROC). HROC is a caucus political committee made up of Republican members of the Washington State House of Representatives.
- 1.2 The Reagan Fund has been registered and reporting with the PDC since March 8, 2007. The Reagan Fund (TRF) and HROC share staff, office, and overhead costs, and are related political committees.
- 1.3 In 2016, The Reagan Fund expenditures included reimbursing HROC for shared overhead and staffing costs, making monetary contributions to political party organizations, and to political committees making independent expenditures or electioneering communications, and monetary contributions to candidates for State Representative.
- 1.4 On October 9, 2015, TRF filed an amended Committee Registration (C-1pc report) registering as a Continuing "Other" political committee, and listing Army Davis as COO-CFO, and Andrew Aboen as Treasurer. The amended C-1pc report filed by TRF was in effect throughout the 2016 election cycle.
- 1.5 On July 7, 2017, TRF filed an amended Committee Registration (C-1pc report) registering as a Continuing "Other" political committee, and listing Dan Kristiansen as Chair, Kevin Carns as Director, and Andrew Aboen as Treasurer.

1.6 On October 25, 2016, Jessica LaVigne with the House Democratic Campaign Committee, filed a complaint with the PDC alleging that TRF failed to disclose an expenditure made in the form of a \$10,000 monetary contribution to the King County Republican Central Committee (KCRCC), a bona fide county political party organization registered with the PDC on Summary Campaign Contributions and Expenditures Report (C-4 report).

**Exhibit #1.**

1.7 A complaint was filed against HROC by another staff member for the House Democratic Campaign Committee, alleging that HROC violated RCW 42.17A.235 and .240 for failing to disclose contributions made to seven legislative candidates for State Representative and to a bona fide statewide political party organization during the 2016 elections. The complaint filed against HROC is being investigated under PDC Case 9208, and will be handled separately.

**II.**  
**Findings**

2.1 Political committees such as TRF that selected the Full Reporting option, and participated in the 2016 election by supporting or opposing candidates, were required to file weekly Monetary Contributions reports (C-3 report) beginning June 1, 2016. TRF was also required to file the following C-4 reports:

- Monthly C-4 reports are due to be filed by the 10<sup>th</sup> of each month disclosing contribution and expenditure information for activities undertaken during the previous calendar month.
- A 21-day Pre-Primary Election C-4 report was due on July 12, 2016, covering the period June 1 through July 11, 2016; and a 7-day Pre-Primary Election C-4 report was due on July 26, 2016, covering the period July 12 through July 25, 2016.
- A Post-Primary Election C-4 report was due by September 12, 2016, covering the period July 26 through August 31, 2016.

2.2 On September 12, 2016, TRF timely filed the 2016 Post-Primary Election C-4 report covering the period of July 26 through August 31, 2016. **Exhibit #2.** The C-4 report disclosed TRF received \$348,550 in monetary contributions and made \$16,163 in expenditures. The committee expenditures included a \$10,000 contribution to Community Progress PAC, a political committee making independent expenditures during the 2016 election, and seven expenditures for Facebook advertising totaling \$4,417.

2.3 No additional expenditures were disclosed on the 2016 Post-Primary Election C-4 report filed by TRF, including the alleged \$10,000 contribution made to the KCRCC as listed in the complaint.

2.4 PDC staff reviewed the complaint, the 2016 C-4 reports filed by TRF, and queried the PDC expenditure database for TRF expenditures for the 2016 election cycle.

- 2.5 Staff found no evidence that the alleged unreported \$10,000 contribution made to the KCRCC had been disclosed on any C-4 report filed by TRF as an expenditure prior to the complaint being filed on October 25, 2016. While PDC staff was reviewing the HROC complaint and the C-3 reports filed by the seven candidates and the Washington State Republican Party (WSRP) listed in the allegations, staff became aware that a \$10,000 monetary contribution had been received by the Washington State Republican Party (WSRP) from TRF. In addition to the KCRCC contribution, staff could not find that the WSRP contribution had been disclosed by TRF.
- 2.6 On October 28, 2016, TRF filed an amended 2016 Post-Primary Election C-4 report covering the period of July 26 through August 31, 2016. **Exhibit #3.** The amended C-4 report filed by TRF included the previously reported \$348,550 in monetary contributions received and \$16,163 in expenditures made, but also disclosed \$84,640 in previously unreported expenditures.
- 2.7 The \$84,640 in new expenditures disclosed on the amended C-4 report filed by TRF included contributions to political party organizations and political committees, and expenditures for political advertising, surveys and research, and get-out-the-vote telephone calls (GOTV). The \$84,640 in new expenditures were disclosed by TRF 46 days late, and 11 days prior to the November 8, 2016 general election being held. The late reported expenditures disclosed by TRF included the \$10,000 contribution to KCRCC and the \$10,000 contribution to WSRP discussed above, as well as the following:

HROC Expenditure to Candidate/Committee	Date Expenditure Made	Amount	Date C-4 Due	Days Late
Sermo Digital (Online advertisements)	7/28/2016	\$ 15,000	9/12/2016	46
Ron Hill (August rent)	7/28/2016	\$ 349	9/12/2016	46
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Lisa Fenton (reimburse mileage)	8/17/2016	\$ 369	9/12/2016	46
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Sermo Digital (website hosting)	8/26/2016	\$ 150	9/12/2016	46
Fallon Research & Communications (Survey LD 17)	8/30/2016	\$ 8,000	9/12/2016	46
<b>Totals</b>		<b>\$ 84,640</b>		<b>46</b>

- 2.8 On September 20, 2017, Mark Lamb, an attorney with the North Creek Law Firm, sent an email to PDC staff on behalf of his clients HROC and TRF. **Exhibit #4.** In the email, Mr. Lamb stated the following:

*“The Reagan Fund and House Republican Organizational Committee both encountered difficulties in reporting due to the oversight of an employee (Andrew Aboen) in 2016.”*

*“Mr. Aboen was given responsibility to transmit the relevant spending and contribution information to the PDC but (on the occasions outlined in the complaints) he did not timely do so. Although the transactions at issue represent a very small amount of the activity undertaken by both committees (and were reported timely and accurately by other entities so the public was aware of the activity), Mr. Aboen sincerely regrets the error as does The Reagan Fund and HROC.”*

*“The Reagan Fund and HROC have amended all of the relevant reports at issue in the complaints.” “The committees have further taken the step of retaining a new outside PDC compliance specialist who will review all filings and advise both committees on internal controls to ensure this does not occur again.”*

### **III.** **Scope**

#### 3.1 PDC staff reviewed the following documents:

- The complaint and exhibits filed on October 25, 2016, by Jessica LaVigne against The Reagan Fund.
- Telephone conversations and email communications with Andy Aboen, with TRF.
- Email communications between Mark Lamb, legal counsel for TRF and PDC staff.
- 2016 C-4 reports filed by TRF.
- C-3 reports filed by the King County Republican Central Committee, and the Washington State Republican Party.

#### 3.2 Queried the PDC Contribution and Expenditure database.

#### 3.3 PDC staff made the following attempts to inform The Reagan Fund concerning the complaint, and obtain a response to the allegations:

#### 3.4 Chronology of PDC staff contacts with TRF concerning the complaint:

- Email with attached complaint sent to TRF email address on October xx, 2016. (No response received)
- Email with attached complaint sent to TRF email address on December 19, 2016. (No response received)
- Letter with attached complaint mailed to TRF mailing address listed on the C-1pc report on March 3, 2017. (No response received)

- On August 18, PDC staff spoke with Andy Aboen, Treasurer for TRF and HROC by telephone concerning the complaints filed against the two committees. After the telephone conversation, staff sent Mr. Aboen an email attaching copies of the two complaints, and requesting a response to the allegations no later than August 26, 2017. Mr. Aboen responded by email stating that TRF/HROC's attorney was reviewing the complaints and working on the responses
- On August 28, 2017, Mark Lamb, attorney representing TRF and HROC, sent an email to the PDC requesting that staff contact him concerning the complaints that had been filed against his clients.
- PDC staff spoke with Mr. Lamb around August 29<sup>th</sup> or 30<sup>th</sup>, in which he stated he recently received copies of the complaints, and requested additional time to review the allegations, and prepare a response. Staff granted TRF and HROC, through Mr. Lamb an extension until September 15, 2017 to submit a response to the complaints.
- On September 20, 2017, Mr. Lamb sent an email to PDC staff responding to the allegations in the complaints filed against TRF and HROC.

#### IV.

#### Statutes and Rules

- 4.1 **RCW 42.17A.005(37)** states that "Political committee" means any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition."
- 4.2 **RCW 42.17A.235(1 and 2)** states the following: "(1) In addition to the information required under RCW 42.17A.205 and 42.17A.210, on the day the Treasurer is designated, each candidate or political committee must file with the commission a report of all contributions received and expenditures made prior to that date, if any. (2) Each Treasurer shall file with the commission a report containing the information required by RCW 42.17A.240 at the following intervals: (b) On the tenth day of the first month after the election.
- Reports filed on the tenth day of the month shall report all contributions received and expenditures made from the closing date of the last report filed through the last day of the month preceding the date of the current report."
- 4.3 **RCW 42.17A.240(1, 5 and 6)** states the following: "Each report required under RCW 42.17A.235 (1) and (2) must be certified as correct by the Treasurer and the candidate and shall disclose the following: (1) The funds on hand at the beginning of the period; (5) The name and address of each candidate or political committee to which any transfer of funds was made, including the amounts and dates of the transfers; (6) The name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures."

Respectfully submitted this 25<sup>th</sup> day of October, 2017.

  
Kurt Young  
PDC Compliance Officer

**List of Exhibits**

- Exhibit #1**     October 25, 2016 complaint filed by Jessica Lavigne, with the House Democratic Campaign Committee, against The Reagan Fund.
- Exhibit #2**     2016 Post-Primary Election C-4 report filed by TRF.
- Exhibit #3**     Amended 2016 Post-Primary Election C-4 report filed by TRF.
- Exhibit #4**     September 20, 2017, email from Mark Lamb, sent to PDC staff on behalf of his clients HROC and TRF.

## File a Formal Complaint - Jessica LaVigne

[Jessica LaVigne](#) reported 6 days ago (Tue, 25 Oct at 10:33 AM) via Portal Meta

October 23, 2016

Mr. Phil Stutzman  
Public Disclosure Commission  
711 Capitol Way #206  
PO Box 40908  
Olympia, WA 98504

Dear Mr. Stutzman:

Please accept this letter as a formal complaint regarding improper disclosure filings by the Reagan Fund.

The King County Republican Committee (exempt) has reported receiving two \$10,000 contributions from the Reagan Fund, the first on July 20th, 2016 and the second on August 12th, 2016. I have attached C3 reports for each contribution that was filed by the King County Republican Committee (exempt).

The Reagan Fund has failed to report the second contribution to the King County Republican Committee (exempt) made on August 12th, 2016. I have attached The Reagan Fund's C4 report for the period covering July 26th through August 31st, where no record of this contribution can be found.

RCW 42.17A.225 requires committees to file timely, accurate reports of contributions and expenditures, including in-kind contributions. Based on this law, the Reagan Fund, has not properly reported this contribution and is not in compliance with state law.

Improperly filing accurate reports of contributions and expenditures has become a pattern with the House Republican Caucus. This is the 10th inaccurately reported contribution in the records of the Reagan Fund and HROC. Please see the complaint filed by Mina Mercer on October 21st for reference. This blatant disregard for state law is illegal and should be highly concerning to the Public Disclosure Commission whose mission it is provide the public with timely and accurate information regarding financing of political campaigns in the State of Washington.

The Reagan Fund's inability to file accurate reports not only violates state law, it also denies the public their right to have access to timely and accurate information regarding political spending in their state and their community.

I respectfully request the Public Disclosure Commission conduct a formal investigation and if wrongdoing is discovered impose appropriate penalties as determined by law.

Sincerely,

**Jessica LaVigne**  
Finance Director  
House Democratic Campaign Committee  
O: 206-381-1220 | C: 503-201-8210 | F: 206-381-1235  
Email: [jessica@hdcc.org](mailto:jessica@hdcc.org) | Web: [www.hdcc.org](http://www.hdcc.org)  
Mail: 4130 1st Avenue South, Suite D, Seattle, WA 98134

### 3 Attachments

PDF

[Reagan C4 9....](#)  
( 160 KB )

PDF

[King Co Repu...](#)  
( 44 KB )

PDF

[King Co Repu...](#)  
( 44 KB )

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
100720936  
09-12-2016

Candidate or Committee Name (Do not abbreviate. Include full name)  
 The Reagan Fund

Mailing Address  
 PO Box 904

City  
 Olympia, WA

Zip + 4  
 98507

Office Sought (Candidates)  
 Election Date  
 2016

Report Period Covered  
 From (last C-4) To (end of period)  
 07/26/16 08/31/16

Final Report?  
 Yes No X

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?

RECEIPTS		*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....		\$		396,658.36
2. Cash received (From line 2, Schedule A) .....		\$	348,550.00	
3. In kind contributions received (From line 1, Schedule B).....			0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....				348,550.00
5. Loan principal repayments made (From line 2, Schedule L).....			0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)			0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)				0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....				745,208.36
9. Total pledge payments due (From line 2, Schedule B).....	0.00			

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....	381,676.44
11. Total cash expenditures (From line 4, Schedule A) .....	16,162.79
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	16,162.79
14. Loan principal repayments made (From line 2, Schedule L).....	0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	397,839.23

CANDIDATES ONLY				CASH SUMMARY		
Won	Lost	Unopposed	Name not on ballot			
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Cash on hand (Line 8 minus line 17) .....	347,369.13
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
Treasurer's Daytime Telephone No.:					19. Liabilities: (Sum of loans and debts owed) .....	0.00
					20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	347,369.13

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Samantha Cotton	09/13/16

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE**  
to C4 **A**  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date  
07/26/16 08/31/16

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
08/05/2016	218,550.00					
08/26/2016	130,000.00					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 348,550.00

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE	C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering	P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead
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3. EXPENDITURES
- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
  - b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
  - c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	436.41
08/15/16	Hotel Murano 1320 Broadway Tacoma, WA 98402-3411	G	Hotel for Tacoma meetings	293.28
08/15/16	The Matador 721 Pacific Avenue Tacoma, WA 98402-5207	G	Meeting meal	120.00
08/01/16	Facebook Ads ,	O	Facebook ads	187.11
07/27/16	Facebook Ads ,	O	Facebook ads	751.42
07/29/16	Facebook Ads ,	O	Facebook ads	750.48
08/31/16	Facebook Ads ,	O	Facebook ads	474.97

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 13,149.12  
Enter also on line 11 of C4 \$ 16,162.79

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/26/16

08/31/16

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
08/18/16	Facebook Ads ,	O	Facebook ads	750.37
08/26/16	Facebook Ads ,	O	Facebook ads	751.92
08/02/16	Facebook Ads ,	O	Facebook ads	750.70
08/15/16	Texaco 1400 NW Louisiana Avenue Chehalis, WA 98532-1730	G	Gas	79.05
08/17/16	Verizon Wireless PO Box 9622 Mission Hills, CA 91346-9622	G	Cell phones	511.77
08/01/16	Century Link PO Box 4300 Carol Stream, IL 60197-4300	G	Internet	132.87
07/27/16	Community Progress PAC 218 Main St PMB 412 Kirkland, WA 98033-6108		Contribution	10,000.00
08/24/16	Newslibrary.com ,	G	News subscription	79.95
08/19/16	Constant Contact 1601 Trapelo Road Suite 329 Waltham, MA 02451-7357	G	Email Service	92.49

Page Total \$ 13,149.12

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100710409

07-25-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 King County Republican Central Committee Exempt

Mailing Address  
 845 106th Ave NE Ste. 110

City Bellevue, WA Zip + 4 98004 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous .....		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L .....		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
07/20/16	THE REAGAN FUND PO BOX 904 OLYMPIA, WA 98507				10,000.00	10,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	<b>Sub-total</b>			10,000.00	<b>*See reverse for details.</b>
		<b>Amount from attached pages</b>			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

10,000.00

4. Date of Deposit: 07/20/16

Treasurer's Daytime Telephone No.: (425) 990-0404

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Arthur Whitten Date: 07-25-2016

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100715749

08-15-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 King County Republican Central Committee Exempt

Mailing Address  
 845 106th Ave NE Ste. 110

City Bellevue, WA Zip + 4 98004 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous .....		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L .....		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
08/12/16	THE REAGAN FUND PO BOX 904 OLYMPIA, WA 98507				10,000.00	20,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	<b>Sub-total</b>			10,000.00	<b>*See reverse for details.</b>
		<b>Amount from attached pages</b>			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

10,000.00

4. Date of Deposit: 08/12/16

Treasurer's Daytime Telephone No.: (425) 990-0404

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Arthur Whitten Date: 08-15-2016

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
100720936  
09-12-2016

Candidate or Committee Name (Do not abbreviate. Include full name)  
 The Reagan Fund

Mailing Address  
 PO Box 904

City  
 Olympia, WA

Zip + 4 98507	Office Sought (Candidates)	Election Date 2016	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <b>independent expenditure</b> (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?
Report Period Covered 07/26/16	From (last C-4) To (end of period) 08/31/16	Final Report? Yes No X	

RECEIPTS		*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....		\$		396,658.36
2. Cash received (From line 2, Schedule A) .....		\$	348,550.00	
3. In kind contributions received (From line 1, Schedule B).....			0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			348,550.00	
5. Loan principal repayments made (From line 2, Schedule L).....			0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)			0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)				0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....				745,208.36
9. Total pledge payments due (From line 2, Schedule B).....	0.00			

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	381,676.44
11. Total cash expenditures (From line 4, Schedule A) .....	16,162.79
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	16,162.79
14. Loan principal repayments made (From line 2, Schedule L).....	0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	397,839.23

CANDIDATES ONLY				CASH SUMMARY	
Won	Lost	Unopposed	Name not on ballot		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Cash on hand (Line 8 minus line 17) .....	347,369.13
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
Treasurer's Daytime Telephone No.:				19. Liabilities: (Sum of loans and debts owed) .....	0.00
				20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	347,369.13

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Samantha Cotton	09/13/16

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE**  
to C4 **A**  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/26/16      08/31/16

**1. CASH RECEIPTS (Contributions)** which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
08/05/2016	218,550.00					
08/26/2016	130,000.00					

**2. TOTAL CASH RECEIPTS** Enter also on line 2 of C4 \$ 348,550.00

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

**3. EXPENDITURES**

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	436.41
08/15/16	Hotel Murano 1320 Broadway Tacoma, WA 98402-3411	G	Hotel for Tacoma meetings	293.28
08/15/16	The Matador 721 Pacific Avenue Tacoma, WA 98402-5207	G	Meeting meal	120.00
08/01/16	Facebook Ads ,	O	Facebook ads	187.11
07/27/16	Facebook Ads ,	O	Facebook ads	751.42
07/29/16	Facebook Ads ,	O	Facebook ads	750.48
08/31/16	Facebook Ads ,	O	Facebook ads	474.97

Total from attached pages \$ 13,149.12

**4. TOTAL CASH EXPENDITURES**

Enter also on line 11 of C4 \$ 16,162.79

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/26/16

08/31/16

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
08/18/16	Facebook Ads ,	O	Facebook ads	750.37
08/26/16	Facebook Ads ,	O	Facebook ads	751.92
08/02/16	Facebook Ads ,	O	Facebook ads	750.70
08/15/16	Texaco 1400 NW Louisiana Avenue Chehalis, WA 98532-1730	G	Gas	79.05
08/17/16	Verizon Wireless PO Box 9622 Mission Hills, CA 91346-9622	G	Cell phones	511.77
08/01/16	Century Link PO Box 4300 Carol Stream, IL 60197-4300	G	Internet	132.87
07/27/16	Community Progress PAC 218 Main St PMB 412 Kirkland, WA 98033-6108		Contribution	10,000.00
08/24/16	Newslibrary.com ,	G	News subscription	79.95
08/19/16	Constant Contact 1601 Trapelo Road Suite 329 Waltham, MA 02451-7357	G	Email Service	92.49

Page Total \$ 13,149.12

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

<b>C4</b> (3/97)	PDC OFFICE USE
	100731136
	AMENDS
	100720936
	10-28-2016

Candidate or Committee Name (Do not abbreviate. Include full name)  
 The Reagan Fund

Mailing Address  
 PO Box 904  
 City  
 Olympia, WA

Zip + 4 98507	Office Sought (Candidates)	Election Date 2016
Report Period Covered 07/26/16	From (last C-4) To (end of period) 08/31/16	Final Report? Yes No X

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....		\$	652,758.36
2. Cash received (From line 2, Schedule A) .....	\$	348,550.00	
3. In kind contributions received (From line 1, Schedule B).....		0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....		348,550.00	
5. Loan principal repayments made (From line 2, Schedule L).....		0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)		0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....			1,001,308.36
9. Total pledge payments due (From line 2, Schedule B).....		0.00	

EXPENDITURES		
10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....		381,689.43
11. Total cash expenditures (From line 4, Schedule A) .....	100,803.44	
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	0.00	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	100,803.44	
14. Loan principal repayments made (From line 2, Schedule L).....	0.00	
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00	
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		482,492.87

CANDIDATES ONLY	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17) .....	518,815.49
<small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	
19. Liabilities: (Sum of loans and debts owed) .....	0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	518,815.49

Treasurer's Daytime Telephone No.:

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Samantha Cotton	10/28/16

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE A**  
to C4  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/26/16      08/31/16

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
08/05/2016	218,550.00					
08/26/2016	130,000.00					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 348,550.00

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	436.41
08/15/16	Hotel Murano 1320 Broadway Tacoma, WA 98402-3411	G	Hotel for Tacoma meetings	293.28
08/15/16	The Matador 721 Pacific Avenue Tacoma, WA 98402-5207	G	Meeting meal	120.00
08/22/16	Dan Kristiansen PO Box 2007 Snohomish, WA 98291-2007	G	Travel Reimbursement	1,860.20
08/05/16	Snohomish County GOP 514 State Ave # 109 Marysville, WA 98270-4556		Contribution	2,500.00
08/09/16	King County GOP 845 106th Avenue NE Suite 110 Bellevue, WA 98004-4308		Contribution	10,000.00
07/28/16	Sermo Digital ,	G	Online Ads	15,000.00

Total from attached pages \$ 70,593.55

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 100,803.44

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/26/16

08/31/16

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
08/26/16	Sermo Digital ,	G	Website hosting July-Dec	150.00
08/05/16	Dialing Services 5149 Cotton Road Roswell, NM 88201-9714	G	GOTV live calls	2,912.35
07/28/16	Ron Hill 915 Trosper Road SW Tumwater, WA 98512-6972		Aug Rent	349.00
08/01/16	Facebook Ads ,	O	Facebook ads	187.11
07/29/16	Facebook Ads ,	O	Facebook ads	750.48
08/31/16	Facebook Ads ,	O	Facebook ads	474.97
08/18/16	Facebook Ads ,	O	Facebook ads	750.37
08/26/16	Facebook Ads ,	O	Facebook ads	751.92
07/27/16	Facebook Ads ,	O	Facebook ads	751.42
08/02/16	Facebook Ads ,	O	Facebook ads	750.70
08/15/16	Texaco 1400 NW Louisiana Avenue Chehalis, WA 98532-1730	G	Gas	79.05
08/17/16	Lisa Fenton 4835 Sunrise Beach Road NW Olympia, WA 98502-8815		Mileage Reimburesment	369.10

Page Total \$ 8,276.47

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/26/16

08/31/16

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
08/17/16	Verizon Wireless PO Box 9622 Mission Hills, CA 91346-9622	G	Cell phones	511.77
08/11/16	Washington State Republican Pa 2840 Northup Way Suite 140 Bellevue, WA 98004-1464	G	Contribution	10,000.00
08/05/16	Fallon Research & Communicatio PO Box 12181 Columbus, OH 43212-0181		Survey LD 5 and 17	29,000.00
08/30/16	Fallon Research & Communicatio PO Box 12181 Columbus, OH 43212-0181		Survey LD 17	8,000.00
08/01/16	Century Link PO Box 4300 Carol Stream, IL 60197-4300	G	Internet	132.87
07/27/16	Community Progress PAC 218 Main St PMB 412 Kirkland, WA 98033-6108		Contribution	10,000.00
07/29/16	Community Progress PAC 218 Main St PMB 412 Kirkland, WA 98033-6108		Contribution	4,500.00
08/24/16	Newslibrary.com ,	G	News subscription	79.95
08/19/16	Constant Contact 1601 Trapelo Road Suite 329 Waltham, MA 02451-7357	G	Email Service	92.49

Page Total \$ 62,317.08

## **Kurt Young**

---

**From:** Mark Lamb <mark@northcreeklaw.com>  
**Sent:** Wednesday, September 20, 2017 10:14 AM  
**To:** Kurt Young  
**Cc:** 'Mark Lamb'  
**Subject:** RE: HROC and The Reagan Fund

Mr. Young,

The Reagan Fund and House Republican Organizational Committee both encountered difficulties in reporting due to the oversight of an employee (Andrew Aboen) in 2016. Mr. Aboen was given responsibility to transmit the relevant spending and contribution information to the PDC but (on the occasions outlined in the complaints) he did not timely do so. Although the transactions at issue represent a very small amount of the activity undertaken by both committees (and were reported timely and accurately by other entities so the public was aware of the activity), Mr. Aboen sincerely regrets the error as does the Reagan Fund and HROC.

The Reagan Fund and HROC have amended all of the relevant reports at issue in the complaints. The committees have further taken the step of retaining a new outside PDC compliance specialist who will review all filings and advise both committees on internal controls to ensure this does not occur again.

Please advise if you require anything additional to address this matter.

Best,

Mark

<image001.jpg> **Mark Lamb**

The North Creek Law Firm  
A Professional Corporation

12900 NE 180<sup>th</sup> Street  
Suite #235  
Bothell, WA 98011

(425) 368-4238  
(425) 489-2824 (FAX)

[www.northcreeklaw.com](http://www.northcreeklaw.com)

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