

November 14, 2018

Mr. Fox Blackhorn
Compliance Coordinator 2
Washington Public Disclosure Commission
Evergreen Plaza
711 Capitol Way So #206
Olympia, WA 98504

RE: PDC Case Number 42563

Dear Mr. Blackhorn:

Thank you for your email of November 2, 2018 and attachments outlining a complaint filed with the PDC by Glen Morgan on October 29, 2018. The following information is being submitted on behalf of YES Libraries Pierce in response to that complaint.

Allegation One:

Violation of RCW 42.17A.220 for failure to timely deposit contributions within 5 business days.

Response:

We have reviewed the spreadsheet that accompanied Mr. Morgan's complaint and have the following observations:

- Four of the nine Due Dates on Mr. Morgan's spreadsheet were inaccurately calculated as 3 calendar days rather than 5 business days as required under state statute. (#100862361, 100853874, 100847398 and 100846070)
- The C3s for Transactions 1-4 on Mr. Morgan's spreadsheet were filed and acknowledged by the PDC either on or before the required 5 days following deposit of the contribution. (#100862361, 100853874, 100849543 and 100847398)
- The remaining C3s for Transactions 5-9 on Mr. Morgan's spreadsheet were filed and acknowledged by the PDC on July 19, 2018 (#100846072, 100846071, 100846070, 100846079 and 100846080). Earlier attempts to file our reports were unsuccessful as I was using an incorrect format for our Filer ID (YES-LP-333 rather than YES LP 333). The reports were filed successfully after the Pierce County Library Trustees' July 11, 2018 decision to place a measure on the November ballot in the General Election, and after I assumed full responsibilities as Treasurer and contacted PDC staff for their assistance in filing reports.

Allegation Two:

Violations of RCW 42.17A.235 for failure to timely report contributions and expenditures.

Response:

YES Pierce Libraries has not incurred debt, and has reported all contributions and expenditures with proper level of detail.

Allegation Three:

Violation of RCW 42.17A.555 for misuse of \$40,000 in public funds to support an election campaign.

Response:

The \$40,000 in two separate contributions of \$20,000 each were received from the Pierce County Library Foundation not the Pierce County Library System as was asserted in Mr. Morgan's complaint. The Pierce County Library Foundation is privately funded, not publicly funded. The C3s associated with these contributions accurately report the contributions from the Pierce County Library Foundation.

In closing, we wish to thank the PDC for bringing the complaint to our attention and for providing assistance as needed during the campaign to file our reports properly. Should you need additional information, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in blue ink that reads "J.J. McCament". The signature is written in a cursive style.

J.J. McCament, Treasurer
YES Libraries Pierce

Attachment:

- Glen Morgan Spreadsheet & Yes Libraries Pierce Response

Exhibit A -- Illegally Late filed C3 and C4 reports

Yes Libraries Pierce Response 11.14.16

Approximate Cumulative Days Late -- 539												
Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Days Late Deposit	Due Date	Date Submitted	Approximate Days Late	Deposit Date	C-3 Filed with PDC	C-3 Due 5 business days after deposit	C-3 Days Late
1	100862361	C3	N	9/28/2018	0	10/1/2018	10/2/2018	1	9/28/2018	10/2/2018	10/5/2018	0
2	100853874	C3	N	8/17/2018	0	8/20/2018	8/22/2018	2	8/17/2018	8/22/2018	8/24/2018	0
3	100849543	C3	N	7/25/2018	0	7/30/2018	8/1/2018	2	7/25/2018	8/1/2018	8/6/2018	0
4	100847398	C3	N	7/20/2018	0	7/23/2018	7/27/2018	4	7/20/2018	7/27/2018	7/27/2018	0
5	100846072	C3	N	4/5/2018	0	5/10/2018	7/19/2018	70	4/5/2018	7/19/2018	4/12/2018	See complaint response dated 11.14.18.
6	100846071	C3	N	4/14/2018	0	5/10/2018	7/19/2018	70	4/14/2018	7/19/2018	4/20/2018	
7	100846070	C3	N	7/6/2018	0	7/9/2018	7/19/2018	10	7/6/2018	7/19/2018	7/13/2018	
8	100846079	C3	N	12/27/2017	0	1/10/2018	7/19/2018	190	12/27/2017	7/19/2018	1/10/2018	
9	100846080	C3	N	12/18/2017	0	1/10/2018	7/19/2018	190	12/18/2017	7/19/2018	1/10/2018	
Total Cumulative Days Late								539				

Note: Incorrectly calculated as 3 calendar days, not 5 business days