

*Schwerin Campbell Barnard Iglitzin & Lavitt LLP*

ATTORNEYS AT LAW

*Of Counsel* Lawrence Schwerin

James D. Oswald

DANIELLE FRANCO-MALONE

*franco@workerlaw.com*

*Original via U.S. First Class mail  
and via e-mail to: pdc@pdc.wa.gov*

December 7, 2018

Compliance and Enforcement Division  
Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504-0908

RE: Active in Democracy  
PDC Case 43017  
SCBIL File No. 4563-001

To Whom It May Concern,

We write to provide a supplemental response to Citizen Complaint 43017, originally filed on October 29, 2018 of this year by Glen Morgan. As previously explained in our letter dated November 26, 2018, many of the allegations in that complaint are utterly unfounded and should be dismissed. As noted in that letter, many of the examples relied upon by Mr. Morgan as examples of violations are outside the scope of what Mr. Morgan could pursue in a citizen action. Nonetheless, we write to provide you some additional information about those alleged violations that occurred more than two years ago.

In addition to the various mitigating circumstances described in our previous letter, there is one additional important consideration applicable to the older alleged violations. Active in Democracy discovered that the individual responsible for PDC reporting had several performance issues that manifested themselves in multiple different ways, including failure to timely file some of the reports noted in the Mr. Morgan's Exhibit A. A new individual is now responsible for those filings, and Active in Democracy has taken care to ensure that this person is properly trained on PDC compliance issues, including sending her to trainings.

In conclusion, Active in Democracy reiterates that while it has made some minor mistakes, it has overall been successful in complying with its reporting obligations, and has taken steps to ensure it is successful in reporting in the future.

Sincerely,



Danielle Franco-Malone  
*Counsel for Active in Democracy PAC*