

January 7, 2019

Mr. Fox Blackhorn  
PDC Compliance Coordinator 2

Subject: PDC Case 43859

I was unable to make the corrections as listed in your letter regarding over-limit contributions as the reports in question were made for two separate campaigns. I hope I am correct in assuming that totals will not and should not aggregate across different races.

The complaint was confusing as several report numbers were incorrect. I have included the correct report numbers based on the donation amounts and dates referenced. When the HOUSE race is separated from the COUNCIL race, no donor has exceeded the allowed amount for donations in the primary or general elections for either race. All aggregate numbers were correct on the original reports except for Clarence Harris Jr.

I was able to clear up the "Clarence" issue by adding Jr and Sr to the names and then correcting the addresses. All of the amended reports now show the correct address for each individual and the corrected aggregate amounts for Clarence Harris Jr.

I have included your directions below along with my comments in red or in charts hoping to make the corrections easier to follow.

I have made the effort to get this to you early in case there is something I have missed and still needs to be amended.

Thank you for your help.

Marsha Manning  
Treasurer – Elect Tanisha Harris

**MY RESPONSES LISTED BELOW IN RED**

**Sent:** Wednesday, January 2, 2019 11:14 AM

**Subject:** Re: PDC - Harris, Tanisha (2): Alleged violations of Chapter 42.17A RCW for accepting over-limit contributions and failure to accurately report contributions and expenditures (EY 16; Dec 18)

Thank you for providing your response to the allegations in PDC Case 43859. It does appear that there are some amendments that will be necessary in order to move this case to resolution.

The 2016 Representative race shows multiple entries, addresses, spouses, and occupations for Clarence Harris, but they all appear to be identical on the Council race. Excluding the contributions made to your Representative race, Clarence appears to have made \$1,976.38 in contributions to the Primary Election for your **2016 Council Race**, which is limited to \$1000 from any individual.

- Please amend your C-3 reports to show which contributions were received by which Clarence and ensure that any amounts that should have been attributed toward your \$1000 limit for the General Election are properly reported.
- If any amount from any of the Clarences received in excess of \$1000 was spent before the Primary election and cannot be reattributed, please let me know how much.
- This should fix the aggregate total issue, as ORCA automatically generates that number without the ability for a filer to modify it.
- If you are/were using a third party reporting software please let us know.

It appears that the "Clarence problem" originated from the process to create "couples" in ORCA. Because there were two Clarences, the software set up Clarence and Thelma correctly but dropped Individual 1 when it could not determine which Clarence I wanted for the Clarence and Karen couple. I have altered their names to be Jr and Sr so that the software will accept both names.

Below is a list of the line items presented in the complaint regarding Clarence Harris. I have put the list in date order and separated Harris Jr from Harris Sr so that it will clearly show the correct aggregate amounts.

The first two reports were donations for the 2016 HOUSE race. These two donations were spent and not transferred to the COUNCIL race. Therefore, any line items dated prior to May will not aggregate for the Council race which is correct.

Complaint	Correct report #	Campaign	Amend #	Date	Amt	Aggregate
Harris Jr 100713979	100691404	House	none	3/30/16	\$500	\$500
Harris Jr 100691408		House	none	4/11/16	\$500	\$1000
Harris Jr 100713979-C4		Council	100879344 fix aggregate	6/5/16	554.38	554.38
Harris Jr 100713980-C4		Council	100879356 fix aggregate	7/23/16	112.01	666.39
Harris Jr 100717277		Council	none	8/25/16	\$500	1166.38
Harris Jr 100717278		Council	100879381 fix aggregate	8/27/16	\$500	1666.38
Harris Sr 100705509	Not in complaint - added for aggregate	Council	none	7/27/16	50.00	50.00
Harris Sr 100717278	100714279	Council	100879370 correct address	7/27/16	100.00	150.00
Harris Sr 100717278		Council	100978381 correct address	8/27/16	\$110	260.00
Harris Sr 100717278	100725711	Council	100879387 correct address	10/11/16	\$100	360.00

Karen Harris appears to have made \$1666.38 in contributions to the Primary Election for your 2016 Council Race, which is limited to \$1000 from any individual.

- For any amount in excess of \$1000 received and not spent prior to the Primary Election, please amend your reports to reattribute that value to the General limit.

- If any amount received in excess of \$1000 was spent before the Primary Election and cannot be reattributed, please let me know how much.

The first two donations from Karen Harris listed in the complaint are for the 2016 HOUSE race and will not aggregate for the COUNCIL race. There are no amendments necessary for Karen Harris. All donations were made as a couple, therefore, reports were only amended to correct Clarence Harris Jr.

Complaint	Correct report #	Campaign	Amend #	Date	Amt	Aggregate
Karen Harris 100691404		House	none	3/30/16	500.00	500.00
Karen Harris 100691408		House	none	4/11/16	500.00	1000.00
Karen Harris 100713979-C4		Council	100879344	6/5/16	554.38	554.38
Karen Harris 100713980-C4		Council	100879356	7/23/16	112.01	666.39

Dian Stack appears to have made \$1,300 in contributions to the Primary Election for your 2016 Council Race, which is limited to \$1000 from any individual.

- For any amount in excess of \$1000 received and not spent prior to the Primary Election, please amend your reports to reattribute that value to the General limit.
- If any amount received in excess of \$1000 was spent before the Primary Election and cannot be reattributed, please let me know how much.

Complaint	Correct report	Campaign	Amend	Date	Amt	Aggregate
Dian Stack 100713721	100691408	House	none	4/11/16	300.00	300.00
Dian Stack 100713952		Council	none	5/23/16	100.00	100.00
Dian Stack 1001704083		Council	none	6/6/16	100.00	200.00
Dian Stack 100704085		Council	none	6/15/16	500.00	700.00
Dian Stack 100711692		Council	none	7/23/16	300.00	1000.00

Dian Stack donated \$300 to the HOUSE race on 4/11/16. That money was not spent in that race and was transferred to the COUNCIL race on 7/23/16 as noted above. Therefore, the reports are correct and the aggregate is correct as reported.

Complaint	Correct report	Campaign	Amend	Date	Amt	Aggregate
Schuermans 100691408		House	none	4/11/16	200.00	200.00

Schuurmans 100704083		Council	none	6/6/16	50.00	50.00
Schuurmans 100704085		Council	none	6/15/16	350.00	400.00
Schuurmans 100713721		Council	none	7/28/2016	500.00	900.00

Doris Schuurmans donated \$200 to the HOUSE race on 4/11/16. That money was spent in that race and was not transferred to the COUNCIL race. Therefore, the reports are correct and the aggregate is correct as reported.

In both the **2016 Council** and **2018 Representative** races, you reported receiving \$2000 in contributions from the **Harry Truman Fund**, which is limited to \$1000 to any individual. Even though it is associated with the Caucus Committee, it is not the official Caucus Committee and is subject to the individual limits on Local and Legislative candidates.

- For any amount in excess of \$1000 received and not spent prior to the Primary Election, please amend your reports to reattribute that value to the General limit.
- If any amount received in excess of \$1000 was spent before the Primary Election and cannot be reattributed, please let me know how much.

Report #100705510 (2016) has been amended to split the Truman Fund donation to half primary and half general. New report numbers are **100879242** and **100879243**.

Report #100824989 (2018) has been amended to split the Truman Fund donation to half primary and half general. New report numbers are **100879412** and **100879415**.

And finally, it appears that Tim Probst did make two contributions to your **2018 Representative** campaign, one of which lists State Rep as the occupation, the other of which is blank.

- Please amend these contributions to show "Director of Workforce Initiatives" at either "Employment Security Department" or "State of Washington".

My apologies for stating that Tim Probst did not donate to the campaign. I was looking at the 2016 Council race since all of the rest of this complaint was about that race. Tim Probst's employment has been corrected for the 2018 House race. The first report occupation was blank because the donated amount was under the amount that would require occupation. The second donation report was amended on report **#100879411**.

Please make these corrections and notify me when you have done so no later than **1/16/19**. If you require any assistance, please give us a call at 360.753.1111 and ask to speak with Filer Assistance who can walk you step-by-step through making the necessary amendments.