

Fox Blackhorn, Compliance Coordinator  
Public Disclosure Commission  
711 Capital Way, Suite 206  
Olympia, WA 98504-0908



International Brotherhood of Electrical Workers  
15937 NE Airport Way  
Portland, OR 97230

Re: Response of Southwest WA Electricians PAC 48 of WA: Alleged violations of RCW 42.17A.405 and .460 for making over-limit earmarked contributions

Dear Mr. Blackhorn,

I write to respond on behalf of the Southwest WA Electricians PAC 48 of WA (PAC 48 of WA) to the complaint submitted to the Public Disclosure Commission by Cheryl Aichele on December 12, 2018, which was assigned ticket number 44063.

The PAC 48 of WA disagrees with the basis and reasoning of Ms. Aichele's complaint. The complaint alleges that funds were funneled through the Clark County Democratic Central Committee (CCDCC) to get around campaign finance limits. This allegation is specifically tied to two contributions made by the PAC 48 of WA to the CCDCC, one made on October 9, 2018, and one made on October 29, 2018. Ms. Aichele's complaint suggests that contributions made to the CCDCC were specifically earmarked for candidates Tanisha Harris and Monica Stonier.

The complaint offers no evidence in support of its allegations aside from claiming the timing of the contributions and expenditures. The PAC 48 of WA had no control over how the CCDCC chose to dispense these funds, or when the organization decided to distribute them. The CCDCC expends contributions received independently and at no point was there an agreement between the parties on how contributions would be dispensed. The funds were donated with the expectation that the CCDCC would expend those funds entirely as the organization saw fit at a time when there were several important races relevant to Clark County.

The complaint references a lack of adherence to internal procedures within the CCDCC as evidence that the funds were earmarked for the above-mentioned candidates. The PAC 48 of WA has no involvement with the CCDCC's internal processes for designating funds, and cannot be held responsible for any deviation from those processes. Whether or not the organization adhered to its internal processes is not for the PAC 48 of WA to determine. And no matter what the conclusion is regarding those processes, no liability should be imparted on the PAC 48 of WA if there were a deviation.

In conclusion, the Southwest WA Electricians PAC 48 of WA strongly disagrees that the PAC was in violation of RCW 42.17A.405 and .460 for its contributions to the Clark County Democratic Central Committee.

In light of the above, we ask that the complaint be summarily dismissed. I thank you for your time and attention to this letter.

Sincerely,

Gary Young  
Business Manager  
Financial Secretary

