

Taki V. Flevaris
taki.flevaris@pacificallawgroup.com

September 11, 2018

VIA EMAILMx. Fox Blackhorn
Compliance Coordinator 2
Public Disclosure Commission
pdcc@pdc.wa.gov**Re: Riccelli Campaign's Response to August 23, 2018 Complaint from Glen Morgan**

Dear Mx. Blackhorn:

We represent Representative Marcus Riccelli and his campaign, Friends of Marcus Riccelli (collectively, the "Riccelli Campaign"). The Riccelli Campaign takes its reporting obligations seriously and appreciates the opportunity to respond to Glen Morgan's complaint dated August 23, 2018. As explained below, the complaint concerns only a single in-kind contribution to the Riccelli Campaign that was reported timely, albeit with an innocent and minor error that has since been corrected.

The Riccelli Campaign timely reported the only in-kind contribution that it received for Pacifica Law Group's legal work, a contribution of \$114 on July 19. *See* Report No. 100848446. Contrary to the allegations in the complaint, the Riccelli Campaign did not receive any other in-kind contributions for Pacifica Law Group's work.

Unbeknownst to the Riccelli Campaign at the time, the notice it received for the \$114 in-kind contribution accidentally listed the wrong contributor, the House Democratic Campaign Committee. The Riccelli Campaign recently received a corrected notice indicating that the contribution came from the Harry Truman Fund. The Riccelli Campaign has thus amended its relevant report accordingly. *See* Report No. 100856566.

The primary source of confusion behind the complaint appears to be that the Harry Truman Fund mistakenly reported another, unrelated expenditure as an in-kind contribution to the Riccelli Campaign. *See* Report No. 100849187. This was an inadvertent error that the

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Riccelli Campaign knew nothing about and that the Truman Fund has since corrected. *See* Report No. 100855092.

In sum, the Riccelli Campaign timely reported the only in-kind contribution that it received for Pacifica Law Group's work, for a modest amount, and reported incorrect contributor information solely due to a mistaken notice. That innocent error has now been corrected. No further action is warranted here.

Sincerely,

PACIFICA LAW GROUP LLP

A handwritten signature in blue ink, appearing to read "T. V. Flevaris", with a stylized flourish at the end.

Taki V. Flevaris