

To; PDC Attn.; Micaiah Titus Ragins,

May 8, 2018

In response to complaint case number 34941. Our group Responsible Taxation of Citizens (RTC) engaged the help of a volunteer, Nancy Gibson, to design a mailer that supported our campaign. To the best of our knowledge, she has never been paid to design a flier or mailer before, but among our volunteer supporters, she seemed to have the closest skill set to design a flier of some kind. After some work and considering the late date (April 10<sup>th</sup>, with the election approaching fast, the 24<sup>th</sup>) we realized the cost of the mailer would be more that we could afford, and would put us beyond the \$5000 threshold for mini-reporting, we abandoned the idea as unworkable and unachievable. Regardless, my over-reporting an in-kind contribution of \$400, that probably doesn't need to be reported at all as a contribution, according to the definition of in-kind contributions, is not a violation.

We never paid for this flier to be designed. A volunteer, on her own time, designed it herself. It was never used by our organization because we couldn't use it, but we didn't place any restrictions upon others using the flier themselves. It appears that our abandoned flier idea was picked up by the Pierce County Republican Party (PCRP), but it wasn't a part of some grand conspiracy. We have done our best to be accurate and comply with all the Public Disclosure laws and rules in RCW 42.17A, and it is challenging for us to see any violation committed by our organization while we complied with the statute.

Despite the mini-reporting status of our group, we went overboard to track every conceivable expenditure or contribution – in-kind or cash. Many of us have never done this before, so we felt it was better to be as comprehensively thorough as possible. As the PDC is aware, under mini-reporting rules, the only way anyone would have access to our files would be if they did an in-person inspection, which happened in this case. This in-person inspection has helped confirm to the PDC that our group complied with the statute.

I appreciate the earnest effort and aggressive desire of the complainant to ensure the campaign finance laws are followed in our state. However, upon every reading and analysis of our actions and the statute, we can find no violations committed by our organization in this matter. We had very little money and while I felt we were efficient and effective with the limited resources we had, this is not a complex situation. We have recording and reported both our expenditures and contributions accurately. Since our organization existed under the mini-reporting structure, the public has never been

denied any information by our actions or lack of actions which could have in any way influenced or informed any member of the community on our organization. We complied with the statute and the rules and can't find any way in which we might have violated them. That appears to just be wishful imagining on the part of the complainant. Please let me know if you need any additional information.

Thank you for helping to keep our governmental processes clear and equitable. I hope this helps in resolving this case. Feel free to contact me with any other questions.

Regards,

Ken Manning - Treasurer,

Responsible Taxation of Citizens