Public Disclosure Commission;

I am writing in response to PDC Case # 30698, a complaint filed by the Washington State Democratic Party against the Cowlitz County Republican Party. Let me assure the Commission that we take compliance with PDC reporting requirements very seriously. We are an all-volunteer organization that reorganizes every 2 years pursuant to RCW 29A.80.030. I was elected as Chairman and Pat Gurrad was elected as Treasurer in December of 2016 for the 2017-2018 term. As newly elected Officers we attended the PDC training on compliance and the ORCA reporting system in February. I would hope that a review of our extensive filing history in 2017 shows our intent to comply. Mrs. Gurrad has made numerous calls to the PDC seeking assistance and in particular noted the assistance of Jenifer Hansen in that regard.

As to the specific allegations let me begin by addressing allegations 3 and 4. The allegation is that our committee had not filed a C1 and as such made unauthorized expenditures. In searching the PDC open data website I located 4 C1 filings since 12/27/2016:

Report # 1001296044 filed 12-27-2016 which was not available on the website but it was noted as amended by report # 100747697.

Report # 100747697 filed 2-10-2017

Reports # 100791867 and 100791864 filed 10-11-2017 (duplicate reports)

As such I would suggest these allegations are unfounded.

The 2nd allegation was that we failed to accurately report a contributor noted as:

Masters Ella 5/1/17 \$240 Kelso, WA 98626

This was an oversight and was corrected in report # 100810233 filed on 2-1-2018

As to allegation 1 concerning late reporting of contributions there are 12 noted instances. The 5 from 2016 occurred during the term of a previous executive board. The additional 7 are from 2017 which occurred during the term of the current executive board. Based on the PDC open data files the dates listed are not

in dispute in 10 of the instances. The two reports I would like to address are 100785844 from 9-8-2017 and 100793951 from 10-17-2017. These reports are related to our annual Lincoln Day Dinner which was held on April 29,2017. There were numerous PDC filings made contemporaneously to that event. Mrs. Gurrad has indicated that she firmly believes she attempted to file the 2 reports in question in a timely fashion. Without knowing the intricacies of the ORCA system, I would only suggest that perhaps the reports were in a que as drafts and were subsequently sent at a later date.

Given the current political environment in which PDC regulations have been weaponized by various factions I am aware that the PDC has been overwhelmed by complaints of this nature. In light of pending legislation to address the matter I would request the PDC to delay further action on this matter until such legislation has become law or the Legislature adjourns without action.

Respectfully,

Brad Thurman-Chairman

Cowlitz County Republicans

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