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JAN 18 2018

Public Disclosure Commission

JANUARY 16, 2018

PUBLIC DISCLOSURE COMMISSION  
POB 40908  
OLYMPIA, WA 98504-0908

**DIRECT ATTENTION OF MIKIAL REGAN.....**

HELLO MIKIAL .....

THIS NOTE AND THE ACCOMPANYING COPIES OF SUPPORTING DOCUMENTS ARE WHAT YOU ASKED ME FOR IN A PHONE CONVERSATION TODAY (Jan 16, 18).

THE ADDITIONAL INFORMATION IS WHAT WAS SENT TO ME FROM JENNIFER HANSEN REGARDING SOME QUESTIONS I HAD ABOUT DEBT PLUS ONE REGARDING THE "FAILURE TO IDENTIFY SUBVENDORS".

ENCLOSED: COPY OF LETTER SENT TO OFFICE OF THE ATTORNEY GENERAL, ATTN: TONY PERKINS

I HOPE THIS WILL BE USEFUL TO ME. HOWEVER, IF ADDITIONAL INFORMATION IS NEEDED I SHALL BE HAPPY SUPPLY SUCH.

*Bob Bennett*

BOB BENNETT, TREASURE 28TH LEG DIST DEMOCRATS

January 3<sup>rd</sup>, 2018

28<sup>th</sup> Legislative District Democrats  
2125 Seaview St. W  
University Place, WA 98466

**To: Tony Perkins**  
**State of Washington**  
**Office of the Attorney General**

**RE: Response to Citizen Action Notice**

**Dear Mr. Perkins:**

**This letter is the official Response to Glenn Morgan's Citizen Action Notice that alleges Public Disclosure Commission violations by the 28<sup>th</sup> Legislative District Democrats in three categories:**

**(1) ILLEGALLY LATE REPORTING C3 AND C4 REPORTS.....**

**Yes, in this case we were late in some filings. We apologize for this lapse in timely reporting and have adjusted our processes to insure that our filings are timely in the future. We will be paying strict attention to the PDC requirements.**

**(2) ILLEGAL FAILURE TO REPORT DEBT ..... (4 items)**

**For the rental of the University Place School District Cafeteria for \$640. The PDC did not consider this to be a debt due to the quick turnaround of payment. We did not know what tier they were going to be charging, the length of time, or if any expenses for staffing would be involved. The day of the event was 4/17/17. We received an invoice on 4/24/17, which we paid on the same day.**

**As to the reimbursement to Mr. Bennett in the amount of \$438 for the purchase of a computer for the Legislative Districts use. (Purchased 1/23/17, Reimbursed on 1/26/17). Again the PDC again advised us this was not required to be reported as a debt because of quick turnaround of the repayment.**

**The \$253 paid to Patti Daily for \$253. This was for a computer printer and other smaller items was not considered to be a debt because again, the quick turnaround of payment. (Expense incurred 1/14/17 – reimbursed on 1/17/17)**

**The \$300 expenditure for booth rental space at the Washington State Fair, for this was a prepayment of the 28<sup>th</sup> Legislative District's share of the booth coordinated by the Pierce County Democrats. Being a prepaid item for our full share and responsibility, we would not consider this to be a debt.**

**The person at the PDC that Mr. Bennett contacted was Jennifer Hansen.**

**Therefore, in through researching these allegations, we have learned more about debts and how they should be reported. Again, our processes have been solidified to insure future iin this area.**

**(3) ILLEGAL FAILURE TO BREAK DOWN EXPENDITURES .....**

**For this allegation, we again contacted the PDC for advice on how we should property break down our expenditures. The PDC explained the green “plus” symbol that can be used to add a second tier of explanation regarding the funds expended to the original vendor. We also learned that we can add additional details in the description field.**

**We are taking this citizen complaint seriously and as a result, have tightened up our processes. We will be looking at how we select and train our volunteer, unpaid treasurers so when we report to the PDC going forward, so we can be better caretakers of the funds we are entrusted with.**

**Bob Bennett, Treasurer 28<sup>th</sup> Leg Dist Dems. [bobbennett33@msn.com](mailto:bobbennett33@msn.com) 253 279 7136  
Patti Daily, Chair – 28<sup>th</sup> Leg Dist Democrats**

**Subject:** Re: PDC - REQUEST FOR CLARIFICATION

**From:** PDC Support <pdcc@pdc.wa.gov>

**Date:** 12/26/2017 3:18 PM

**To:** bobbennett33@msn.com

**CC:** bobbennett33@msn.co, pattidailey28@gmail.com

Hi Bob,

Thank you for your patience.

Here are your first questions with answers.

1ST QUESTION: ON JAN 23, 2017 THE 28TH PURCHASED A COMPUTER. OUR CHAIRPERSON ASKED ME TO PAY FOR IT WITH MY PERSONAL CREDIT CARD, WHICH I DID. THREE DAYS LATER, ON THE 26TH I WROTE A LEG DIST CHECK TO MYSELF FOR REIMBURSEMENT OF SAID PURCHASE. MY QUESTION: SHOULD HAVE LISTED THIS AS A DEBT TO MYSELF ON THE 23RD? - Answer: This is not a reportable debt because of the quick turnaround in the repayment of the out-of-pocket expenditure. See my attachment for details about debts.

2ND QUESTION: ON APRIL 20TH, 2016 THE 28TH WAS MAILED AN INVOICE (DTD ~ 4/20/16) FOR THE RENTAL OF THE CURTIS HI SCHOOL CAFETERIA (USED FOR AN ALL DAY CAUCUS EVENT) . THE AMOUNT WAS \$640.00. ON 4/24 /16 I (AS TREASURER) 1WENT TO THE SCHOOL AND PAID SAID BILL. THE ACTUAL DATE OF THE CAFETERIA RENTAL WAS 4/17/16. - Answer: If I understand correctly, the rental arrangement was made on 4/17 and the final payment in full was made on 4/24. If this is correct this is also not a debt because of the quick turnaround in the repayment.

AS OF 4/17/16 THE WE DID NOT KNOW THE AMT AND DID NOT FIND OUT UNTIL THE INVOICE ARRIVED. MY QUESTION: AT WHAT DATE SHOULD I HAVE LISTED THIS AMOUNT AS A DEBT? - Answer: I assume you are asking a more specific question about the cafeteria rental. No debt in this case, however, anyone reserving a space should obtain the actual cost of the rental or other service at the time the arrangement is made so you can report it as a debt if needed. If the end of the reporting period had come and you had not paid the debt in full you would be required to report it as a debt and then pay the debt later. If an actual cost is not known then an estimate is reported.

Next set of questions and answers.

The 28th LD has been charged of 'FAILURE TO IDENTIFY SUBVENDOR'. I am taking just one item so that I can understand more fully what that might mean.

I am taking a very simple one, consisting of two suppliers. I made a LD check out to the person who bought supplies. She, in turn, obtained said supplies from two vendors.

The total check was for \$65. 83. Her sales slips came from two places: TO WIT; STARBUCKS for 2 coffee "Travelers" amounting to \$34.90. --- AND --- SAFEWAY for doughnuts, bagels, soft drinks and bananas. for \$30.93.

Am I to identify the SUBVENDORS like this: STARBUCKS AND SAFEWAY??

--- Or is it STARBUCKS \$34.90 --- SAFEWAY \$30.93? - Answer: The term "subvendor" is commonly used when a debt is owed to someone and it is known that the person will be employing another to do work for them. For example, a consultant will charge you \$2,000 but give \$500 to a design company and \$1,000 to a printer. The consultant would be listed as the one the debt \$2,000 debt is owed to but you would also be required to disclose the design company and printer as subvendors. It doesn't appear that this is the case you describe. In this instance, the person who

bought the supplies is the vendor and the description should detail what she purchased and where. ORCA allows for a breakdown of expenses by using the "green plus" symbol to add a second tier to the funds owed to the original vendor. I think you would also be in compliance if you simply included the details in the description field.

I hope this is helpful. Please review the additional information in the attached document regarding debts.

**Jennifer Hansen**

Filer Assistance Specialist

Tel: 360-586-4560

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To respond, please reply to this email.

Washington Public Disclosure Commission

<http://www.pdc.wa.gov>

1.360.753.1111

On Thu, 21 Dec at 5:23 PM , PDC Support <pdcc@pdc.wa.gov> wrote:

Hi Bob,

I have received all four of your requests for clarification. I will review your specific questions and send you a response on Tuesday, December 26th. Thank you for your patience.

**Jennifer Hansen**

Filer Assistance Specialist

Tel: 360-586-4560

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On Sat, 16 Dec at 1:52 PM , Bob Bennett <bobbennett33@msn.com> wrote:

The 28th Leg Dist Dems has been reported to the Atty Gen's office as not having listed 4 items as a debt. To keep explanations on the simpler side I am asking you to help me understand I two of the four items.

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Thank you for your assistance.

Bob Bennett, Treasurer for the 28th Leg Dist Dems.

Attachments:

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Debts \_ Loans.docx

15.3 KB