

I am writing in response to the recent complaint filed against me by Glen Morgan on November 2, 2017. Thank you for the opportunity to respond.

1) Failure to timely report contributions and expenditures (Violation of RCW 42.17A.235)

In reviewing this allegation, Mr. Glen Morgan identifies four (4) reports that he cites as being late. Two (2) reports that he cites as being late (one made on 6/27 and the other on 7/28) are incorrect simply by virtue of having been documented at a monthly basis since I did not have a primary in my race. At the time, we were following the Public Disclosure Commission's Candidate's Guide for reporting requirements. All contributions we received were deposited in accordance with the "Candidate's Guide to Reporting" Deposit campaign contributions within five business days of receipt. Thus, the contributions were reported within the proper timelines as well. This is the guide that my campaign Treasurer was instructed to use when she attended training put on by the PDC last year. My campaign treasurer and I have read through the Public Disclosure Commission's Candidate's Guide extensively which clearly states the reporting requirements for each period and feel we did as instructed at the beginning of the campaign.

The Reports & Dates section of the Guide states: Reports & Due Dates. The Index of Forms explains the purpose of each report and when it is due. The PDC calendar shows actual report due dates. Reporting dates are also programmed into the ORCA software.

- Starting in June, each deposit is reported on the following Monday.
- Expenditure reports are filed 21 and 7 days before the election and on the 10th of the month following the election.

The guide referenced above is the guide that my campaign Treasurer was instructed to use when he attended training put on by the PDC last year. It clearly states that a candidate who does not appear on the primary election ballot continues to file monthly reports. In addition, the professional photograph Mr. Morgan details is a work photograph that was taken prior to me running for office. I was told by the PDC that I did not need to report this as an in-kind contribution as it was not taken for campaign purposes. Also, regarding mailers to registered voters, the campaign was endorsed by the King County and 30th District Democrats and was provided access to lists mailing lists. We never had to purchase mailing lists as they were provided within the expenditures of mailers. We properly reported that expenditure on the 10/16/2017 C4 (expenditure for \$4,902.52 payment to Win Power Strategies for our mailers).

As for the other (2) late C4 reports that are cited, I acknowledge that my campaign did fail to report in a timely fashion the two expenditure reports we had incurred. Since we did not have a primary, we were not aware that we needed to begin to report these right away beginning in September. I apologize for this oversight, it is my first time running for office. That said, my campaign treasurer has taken the necessary steps to be in full compliance with PDC reporting requirements ever since. Again, I have not intentionally filed my reports late. I relied upon the PDC's Candidates Guide. I respectfully request that the C3s and C4s in question not be subjected to violations of State law. Since receiving the mentioned complaint on 11/7, all reports have been filed in a timely manner.

2) Failure to accurately report debts and obligations (Violation of RCW 42.17A.240)

The items listed were not debt. They were expenditures that were reported based on when invoices were received and paid. Further, the PDC has advised candidates that vendors of ministerial services,

such as services performed by treasurers, as well as fundraisers, salaries, and other recurring expenditures should be reported as expenditures in the month paid, but not as debts or outstanding obligations. This was highlighted in the PDC-sponsored training. Here, all of the expenditures were properly reported in full transparency to the public.

3) Failure to accurately provide detailed breakdowns of expenditures (Violation of RCW 42.17A.240 and WAC 360-16-037)

In response to the allegation that I illegally failed to break down in-kind contributions related to legal services, we followed the guidance from the PDC (Mr. Fox Blackburn) while trying to take into consideration the very limited space that is provided in the ORCA software for detailed breakdowns of expenditures and in-kind contributions. In fact, the expenditures listed were each paid to the identified vendor for specified goods or services. All these expenses have descriptions. Some are more detailed than others, in some cases it is difficult to list more details. At a PDC training, they suggested that notes reflect vendor, address of vendor and what vendor provided in notes section on ORCA C4 entries. That is exactly what was provided here. Regarding the allegations that there was a failure to identify which entity rendered particular services, I listed the actual vendor that invoiced us for the service and to which payment was made, which is proper given the guidance received.

4) Accepting over-limit contribution from SEIU 1199 (Violation of RCW 42.17A.405)

There was no acceptance of over-limit contributions from SEIU 1199 from my campaign. I have been able to work with Jennifer Hansen and Fox Blackhorn of the Public Disclosure Commission to discuss and address the filing issue. We discovered that the donation of \$1,000 from SEIU 1199 was duplicated in the ORCA system to show \$2,000 due to a systems error. In the process of finding the cause and solution to the duplicate contribution from SEIU 1199, we were able to use a current backup of my campaign to consolidate reports and determine how to correct the reporting in the system which now reads \$1,000. Both Jennifer and Fox have copies of the original reports, the new corrected reports and the individual contributions that were duplicated that you may have for your review.

As a first time candidate for local office with a new treasurer and campaign manager, we had to quickly learn how to use the ORCA system and did our very best. I take campaign laws very seriously. I strive to file reports that are accurate and thorough and not subject to misinterpretation and to be compliant with PDC rules and the RCWs. Since we did not receive any complaint throughout the entire campaign from any individual in the public until Election Day 11/7, I question the motives of the complaint. We also were not aware of any new action that we needed to take until 11/7. Throughout the campaign, we still did our due diligence in trying to learn as quickly as possible and reporting to the best of our ability. I have also been very honest and transparent in my communication with Jennifer and Fox at the PDC in resolving these issues and have timely and thoroughly responded to each complaint in this letter. Nothing I have done has been done with any ill intent or any attempt to deceive. We hope that in making your determination, consider the mitigating circumstances and the corrective action I've taken to comply with PDC requirements I hope that I have satisfied your request and would make myself available to provide any additional information as necessary. It is very important to me to comply with not only the PDC but your office as well.

Respectfully and Sincerely,

Jesse Johnson

