

November 27, 2017

Washington Attorney General's Office
Tony Perkins
tonyp[atg.wa.gov]

Re: Glen Morgan Complaint

Dear Mr. Perkins:

This letter responds to the complaint from Mr. Glen Morgan concerning Representative Ruth Kagi's 2016 campaign for State Representative in the 32nd LD. Below I address each of the alleged violations identified in Mr. Morgan's complaint.

1. Timely and accurate C3 and C4 Reports.

Upon review of the C3 and C4 reports for the 2016 campaign, I find the cumulative days late to be 13 days not the 100 stated by Mr. Morgan. It should be noted that we filed sixty-nine (69) C3 and C4 reports during the course of this campaign demonstrating a firm commitment to filing timely reports.

- a. C4 (Reference # 100692294) combined reporting period for 1/1/2016 to 4/30/2016, therefore was not due until 5/10/2016 although the report was filed early on 5/2/2016
- b. C4 (Reference #100738742) The C4 was inadvertently filed 6 days late.
- c. C4 (Reference #100675646) The C4 was inadvertently filed 5 days late.
- d. C3 (Reference #100702505) reported within 5 days of deposit per PDC rules
- e. C3 (Reference #100714123) this report was originally filed on time but was later amended
- f. C4 (Reference #100728580) The C4 was inadvertently filed 1 day late.
- g. C4 (Reference 100733303) The C4 was inadvertently filed 1 day late.

2. Timely and accurate reporting of debt.


This committee reported debt items in a timely manner on each C4 report. It appears from this complaint that Mr. Morgan simply lists most of the committee's expenses and claims they should have been reported as debt on the previous C4 report without explanation or review. For example, he claims a design expense from NWP Consulting for \$598.17 should have been reported as debt on the May C4. There was no way to predict the amount of time a designer would spend on this expense or when they would get to it, as it is dated June 3rd and was reported on time. Everything on his list of debt items were reported as an expense that was incurred and paid within the same reporting period.

3. Expense descriptions.

The description of each campaign expenditure at issue is identified on the campaign reports. The reports identified the parties to whom each expenditure was paid, the dollar value, and the purpose of the expenditure, which is consistent with the requirements under state law. More detail can be provided upon request.

Thank you for the opportunity to address this complaint. Please let us know if you have any questions or require further information.

Sincerely,


Cathy Scott, Treasurer

