



MASON COUNTY DEMOCRATS

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Mason County Democratic Central Committee
PO Box 1272
Shelton, Washington 98584-0952

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NOV 09 2017

Public Disclosure Commission

November 9, 2017

Mr. Tony Perkins
Investigator, Campaign Finance Unit
Washington Attorney General's Office
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

Dear Mr. Perkins:

Thank you for forwarding to me the complaint filed by Glen Morgan against the Mason County Democratic Central Committee (MCDCC) on October 16, 2017. The complaint alleges late, incomplete and inaccurate C3 and C4 report filings; failure to timely report debt; and failure to adequately describe expenses dating back to 2015.

The MCDCC is a small group with modest funds that is unable to hire a professional treasurer or seek ongoing professional financial advice. The executive board and supporting committee members are all volunteers. In December 2016, the MCDCC elected a new executive board at its reorganization election. The newly elected chair and vice chair soon became aware of recurrent late report filings and took steps to ensure timely submissions. When these measures did not succeed, the board chose to replace its treasurer, who resigned on April 21, 2017. A new treasurer was appointed and the board has since more closely monitored performance and timeliness. The MCDCC acknowledges that it failed to file timely C3 and C4 reports for several reporting periods in 2015, 2016, and 2017. Nonetheless, there are several mistaken general assumptions in the complaint that warrant discussion.

First, in numerous instances we noted that the complainant deemed a report late and calculated elapsed days between the report's initial due date and the date an amendment was submitted. This calculation method ignores that an initial report had been filed and then subsequently amended. Amended reports are due in the next reporting period after the need for a reported revision becomes known. The net result of the complainant's calculations was a significant (four fold) increase in the number of days alleged late.

Second, the purpose of RCW 42.17A is to make available to Washington State voters timely disclosures of contributions and expenditures in support or opposition to ballot

measures, initiatives or candidates. MCDCC did not make expenditures or receive contributions in 2015 or 2017 for these purposes. Therefore the C4 and C3 reports were required to have been filed only using a monthly basis. This also significantly reduces the number of alleged days late.

Specific information on individual reports, organized by year and reporting periods, and identified by the complainant's Line Item Number follows.

Exhibit A

2015

MCDCC failed to file timely C3 and C4 reports for several reporting periods in 2015.

Line Items 34 and 35. MCDCC filed a C4 report covering period 11/1-11/30/15 on 12/22/15. The C4 report was due 12/10/15. The C4 was filed 12 days late. The C3 for the same period was also filed 12 days late.

Line Items 1, 36 and 37. MCDCC filed a C4 report covering period 12/1-12/31/15 on 1/22/16. The C4 report was due 1/11/16. The C4 was filed 11 days late. An amended report was filed 2/27/17. It reported a change in expenditures of \$3.00 for the monthly Key Bank service charge. The C3 for the same period was also filed 11 days late.

2016

MCDCC failed to file timely C3 and C4 reports for several reporting periods in 2016.

Line Items 2, 44, and 46. MCDCC filed a C4 report covering the period 2/1-2/28/16 on 3/11/16, one day late. An amended C4 was filed 3/1/17. The revised C4 reflects an additional \$145 in contributions. A C3 was also filed on 3/11/16, one day late.

Line Items 30 and 31. MCDCC filed a C4 report for the period 3/1-3/31/16 on 4/29/16, 18 days late. A C3 report was also filed on 4/29/16, 18 days late.

Line Items 3, 11, and 12. MCDCC filed a C4 for the period 4/1-4/30/16 on 7/1/16. The report was due 5/10/16, and was filed 52 days late. An amended report was filed 3/1/17. The revised report included an additional expenditure of \$3.49 in payment of a monthly fee for Act Blue. A C3 report was also filed on 7/1/16, 52 days late.

Line Item 28. MCDCC filed a C4 report for period 5/1-5/31/16 on 7/1/16. The report was due on 6/10/16. It was filed 21 days late.

Line Items 5 and 40. MCDCC filed a C4 report covering the period 6/1-7/11/16 on 7/14/16, two days late. An amended C4 was filed 3/1/17. The revised C4 reflects an additional \$593 in contributions and \$1,283 in expenditures.

Line Item 29. MCDCC filed a C4 report for period 7/12-7/25/16 on 8/15/16. The report was due on 7/26/16. It was filed 20 days late.

Line Item 32. MCDCC filed a C4 report for period 10/18-10/31/16 on 11/16/16. The report was due on 11/1/16. It was filed 15 days late.

Line Item 22. MCDCC filed a C4 report for period 11/1-11/30/16 on 1/6/17. The report was due on 12/12/16. It was filed 25 days late.

Line Items 41, 42, and 43. MCDCC filed a C4 report for period 12/1-12/31/16 on 1/12/17. The report was due on 1/10/17. It was filed 2 days late. The C3s were also filed at the same time and were 2 days late.

Line Item 16. MCDCC filed a C4 report for period 1/1-1/31/16 on 3/9/16. The report was due on 2/10/16. It was filed 28 days late.

Line Items 7 and 45. MCDCC filed a C4 for the period 7/26-8/2/16 on 9/13/16. It was filed one day late. An amended report for the same period was filed on 3/1/17. An expenditure of \$25 was paid to the Port of Allyn to reserve a room.

Line Items 4, 6, and 8. MCDCC filed a C4 for the period 9/1-10/17/16 on 10/9/16. An amended C4 was filed 3/1/17. A second amended report was filed 5/1/17. A third amended report was filed 6/8/17.

Line Item 39. MCDCC filed a C3 report on 10/9/16. The bank deposit was made 9/26/16. The report was due 10/3/16. The report was filed 6 days late.

Line Item 33. MCDCC filed a C3 report on 9/13/16. The bank deposit was made 8/23/16. The report was due 8/29/16. The report was filed 15 days late.

Line Item 27. MCDCC filed a C3 report on 9/13/16. The bank deposit was made 8/17/16. The report was due 8/22/16. The report was filed 22 days late.

Line Item 26. MCDCC filed a C3 report on 11/16/16. The bank deposit was made 10/20/16. The report was due 10/24/16. The report was filed 23 days late.

Line Item 23. MCDCC filed a C3 report on 8/12/16. The bank deposit was made 7/14/16. The report was due 7/18/16. The report was filed 25 days late.

Line Item 19. MCDCC filed a C3 report on 1/6/17. The bank deposit was made 11/15/16. The report was due 12/12/16. The report was filed 25 days late.

Line Items 17 and 18. MCDCC filed duplicate copies of a C3 on 3/9/16. The report was due 2/10/16. Both copies were filed 27 days late.

Line Item 14. MCDCC filed a C3 report on 9/13/16. The bank deposit was made 8/4/16. The report was due 8/8/16. The report was filed 36 days late.

Line Item 15. MCDCC filed a C3 report on 7/14/16. The bank deposit was made 5/22/16. The report was due 6/6/16. The report was filed 38 days late.

2017

MCDCC failed to file timely C3 and C4 reports for several reporting periods in 2017.

Line Items 9 and 24. MCDCC filed a C4 report covering period 1/1-1/31/17 on 3/6/17. The C4 report was due 2/10/17. The C4 was filed 24 days late. An amended C4 for the same time period was filed on 4/5/17. It included \$346.77 in contributions not included on the original C4.

Line Item 20. MCDCC filed a C4 report covering period 2/1-2/28/17 on 3/6/17. The C4 report was due 3/10/17. The C4 was timely filed. An amended C4 for the same time period was filed on 4/5/17. The amended C4 removed the \$346.77 from the February report. The net result of the changes to these two reports is a zero.

Line Item 25. MCDCC filed a C4 for the period 6/1-7/10/17 on 8/4/17. The correct filing period was 6/1-6/30/17 with due date of 7/10/17. MCDCC filed the report on 8/4/17, 25 days late.

Line Item 38. MCDCC filed C4 for the period 7/11-7/24/17 on 8/4/17. There was no requirement to file this report.

MCDCC filed a C4 for the period 7/25-8/31/17 on 9/11/17. A C4 should have been filed for the period 7/1-7/31/17 on 8/10/17 and for the period 8/1-8/31/17 on

9/10/17. The time periods for reporting were covered by the C4 that was filed and the report was filed 1 day late.

Line Item 10. MCDCC filed a C3 covering 1/23/17 contributions on 3/6/17. A C3 should have been filed on 2/10/17. It was filed 24 days late. The report was amended 4/5/17.

Line Item 13. MCDCC filed a C3 for contributions on 8/3/17. The report should have been filed on 7/10/17, since MCDCC did not participate in any local ballot measure, initiatives, or support or oppose any candidates in 2017. The report was filed 24 days late.

Line Item 21. MCDCC filed a C3 for 2/27/17 contributions on March 6, 2017. The report was timely filed. An amended C3 was filed 4/5/17.

In summary, the complainant's estimate of alleged cumulative days late for MCDCC's 2015–2017 C3 and C4 reporting was 2,841. Based on MCDCC's review of the applicable records, the actual cumulative days late for all reporting during this period was 728 days. MCDCC acknowledges the deficiency in timely reporting but notes that none of the untimely reporting entailed significant contributions or expenditures in support or opposition to ballot measures, initiatives or candidates. MCDCC has endeavored to correct its reporting deficiencies.

EXHIBIT B

As previously noted, MCDCC did not make expenditures or receive contributions in 2015 or 2017 in support or opposition to ballot measures, initiatives or candidates. Therefore the C3 and C4 reports were required to have been filed on only a monthly basis. This significantly reduces the number of alleged days late.

Several of the allegations entail late expenditure filings for recurring general liability insurance, monthly office rental and equipment storage and an annual holiday party for MCDCC's membership (Items #1, #2, #3, #4, and #7 to #14.) These expenditures supported MCDCC's general activities. They were not related to any specific ballot measure, initiative, or candidate.

Specific information on individual reports, organized by year, and identified by the complainant's Line Item Number follows.

2015

Line 1: Liberty Mutual Insurance — The reporting requirement for a C4 report for MCDCC was filing a monthly C4 by the 10th of the following month. There was no requirement for MCDCC to file a C4 seven days prior to a general election.

In late 2015, an executive board member researched general commercial liability insurance for MCDCC from companies and costs for liability coverage year 2016. The board member made a presentation regarding various insurance policies to the executive board on November 4, 2015, a day after the general election. Until the selection/decision of the board, reporting a debt for this item at an earlier date was not possible because of unknown vendor/price. Payment to the vendor was made on 11/15/15. Full disclosure of this expense was made on the C4 filed 12/22/15, 12 days late, not 718 days late.

Line 2: City of Shelton — At the regular monthly executive board meeting on November 4, 2015, a day after the general election, the executive board authorized the payment

to the city of Shelton for use of facilities at the civic center for the annual holiday event. Payment was made on November 5, 2015. Until the authorization of the board, there was no debt. Full disclosure of this expense was made on the C4 filed 12/22/15, 12 days late, not 718 days late.

2016

Line Item 3. Phila Holding Co. The application fee, security deposit, and pro-rated March rent was paid on 3/3/16 and reported on the March C4 (100692114) filed 4/29/16, 18 days late.

Line Item 4. Phila Holding Co. The April rent was paid on 4/13/16 and reported on the April C4 (100704855) filed 7/1/16, 51 days late.

Line Item 5. Roslynn Reed. MCDCC reported Ms. Reed's reimbursement for the 5/22/16 purchase of a ceremonial blanket gift from KTP Shell for the speaker at the Kennedy Dinner on the C4 (#100704858) filed 4/5/17.

Line Item 6. Lucky Dog Casino. Lucky Dog Casino requires a guarantee of the number of dinners to be served/paid for seven days prior to the event. An estimated 100 plates at \$25 per plate should have been reported on the May C4; due 6/10/16 and filed 7/1/16, 21 days late.

Line Item 7. Phila Holding Co. The May rent was paid on 5/22/16 and reported on the May C4 (100704858) filed 7/1/16, 21 days late.

Line Item 8. Phila Holding Co. The June rent was paid on 6/2/16 and reported on the monthly C4 (100708515) filed 7/14/16, two days late.

Line Item 9. Phila Holding Co. MCDCC did not report the future for rent of the campaign office. The August rent was paid on 8/8/16 and reported on the August C4 (100720963) filed 9/13/16, one day late.

Line Item 10. Phila Holding Co. The September rent was paid on 9/5/16 and reported on the September C4 (100724814) filed 10/9/16. The debt should have been reported on the 21-day post primary C4; due 9/12/16 and filed 9/13/16, 1 day late.

Line Item 11. Phila Holding Co. The October rent was paid on 10/20/16 and reported on the C4 filed 11/16/16, 15 days late. The debt should have been reported on the 21-day pre-general C4 which was timely filed 10/9/16 but did not include the rental debt.

Line Item 12. City of Shelton. MCDCC held their annual holiday potluck dinner at the Shelton Civic Center in December 2016. The city does not reserve/hold space until a deposit is made with the city. There is no evidence in the financial records of payment to the city until 11/15/16. The rental agreement for the event was for \$485, not \$570. The report was due 12/12/16, but was filed 1/6/17, 25 days late.

Line Item 13. Downtown Mini Storage. MCDCC had a campaign office until 11/15/16. The need for storage space was discussed at both the October 5, 2016, and November 2, 2016, executive board meetings, but the issue was set aside for further review. Rental space was secured on November 15, 2016, and reported for the period 11/1 to 11/30/16 on the November C4; due 12/12/16 and filed 1/6/17, 25 days late.

Line Item 14. Phila Holding Co. MCDCC did not report the future for rent of the campaign office. The November rent was paid on 11/15/16 and reported on the C4 (100739946) filed 1/6/17, 27 days late.

2017

Line Item 15. Capitol City Press. MCDCC has an annual holiday pot luck dinner in December. There is no business meeting except in the years a new slate of officers is elected. The executive board presents the slate, it is voted on and the business meeting is closed. In the years when is no new officers are elected, there is no business meeting. There is no evidence in the records that the remittance envelopes were discussed or ordered. This expense was appropriately reported on the January C4 (100751006) filed 3/6/17, 24 days late.

Line Item 16. Little Creek Casino. MCDCC held its annual Kennedy Dinner at Little Creek Casino in May 2017. For several previous years, the event had been held at Lucky Dog Casino. The decision was made at the executive board meeting on March 1, 2017, to have the dinner at Little Creek. On March 2, 2017, several members of the board met with representatives of the casino and reviewed the menu. The treasurer made the deposit for the dinner on 3/6/17. There are no financial records showing an earlier date. The expense was reported on the March C4 (100754522) timely filed 4/5/17.

Line Item 17. Diane McLean. Reimbursement for purchase of postage stamps and printer ink cartridges for the March 2017 membership dues drive. Mr. and Ms. McLean's credit card records indicate purchase dates of 2/16/16 and 2/22/16 for the stamps and printer cartridges, respectively. While the debt was incurred during the February reporting period, the receipts for reimbursement were not received by the treasurer until March 2017, and were reported on the March C4 (100754522) timely filed 4/5/17.

Line Item 18. Marcia Hamilton. Ms. Hamilton held a planning committee meeting at her home on May 19, 2017. Ms. Hamilton stated that she did not make the decision to make the in-kind contribution on behalf of MCDCC until several days before the meeting. She stated she did not discuss it with any board members. Board members have also stated they had no prior knowledge of her proposed contribution. There is no evidence this in-kind contribution should have been reported in April. It was appropriately reported on the May C4 (100766734) timely filed 6/8/17.

Line Item 19. Little Creek Casino. Little Creek Casino requires a guarantee of the number of dinners to be served/paid for seven days prior to the event which occurred on 5/21/17. An estimated 100 plates at \$30 per plate should have been reported on the May C4; due 6/12/17 but filed 7/1/17, 19 days late. A final billing for food was received from Little Creek Casino in the amount of \$4,001.04 on 5/22/17 and paid on 7/10/17. The delay in payment was due to an internal dispute between different departments within the vendor, which resulted eventually in a partial refund, not due to a deliberate withholding on MCDCC's part. This disbursement was reported on the C4 submitted 8/4/17.

In summary, the complainant's estimate of alleged cumulative days late (Exhibit B) for MCDCC's 2015-2017 C3 and C4 reporting was 5,192. It appears the complainant incorrectly added his alleged days which actually totaled 7,864. Nonetheless, based on MCDCC's review of the applicable records, the actual cumulative days late for all reporting during this period was 243 days. MCDCC acknowledges the deficiency in timely reporting but notes that none of the untimely reporting entailed significant contributions or expenditures in support or opposition to ballot measures, initiatives or candidates. MCDCC has endeavored to correct its reporting deficiencies.

Exhibit C

Complainant's Exhibit C alleges that the expenditures described therein violate WAC 390-16-037. WAC 390-16-037 addresses expenditures made on behalf of a political candidate or a candidate's campaign committee. Per RCW 42.17A.005.13 all of the expenditures, with the exception of Items #5 and #19, listed on Exhibit C fall outside the scope of WAC 390-16-037. Items #5 and #19 included the purchase of campaign button blanks and an office telephone battery. While neither was for the benefit of one particular candidate, candidate committee or ballot measure, they were stock purchases to be utilized by MCDCC as needed. Information requested in the complaint is furnished in the attached spreadsheet. Factual corrections to information supplied by Mr. Morgan have been made as well.

This narrative and attached exhibits address Mr. Morgan's complaints regarding the MCDCC's public disclosure reporting. The MCDCC supports strong public disclosure requirements as vital to maintaining free and open elections. Please contact the MCDCC if you require further clarification of our submitted materials or other aspects of our financial political activities.

Sincerely,



Diane McLean, Chair
Mason County Democratic Central Committee

Attachments:

- Exhibit A — Alleged Late filed C3 and C4 reports
- Exhibit B — Alleged Failure to Timely Report Debt
- Exhibit C — Alleged Failure to Break Down Expenditures

Exhibit A -- Alleged Late filed C3 and C4 reports

Mason County Democratic Central Committee

Item #	Report #	Report Type	Amended? Y/N	Deposit Date	Original Report Due Date	Original Date Reported	Actual Days Between Due & Rpt Date (MCDCC)	Days Alleged Between Due & Rpt Date (Morgan)	Amended Date	Days Between Due & Amend. Date (MCDCC)	Comments	
1	100750044	C4	Y		1/11/2016	1/22/2016	11	413	2/27/2017	413	This report amends 100676027 which was filed 1/22/16. See violation #36. The amendment is not a reportable violation.	
2	100750422	C4	Y		3/10/2016	3/11/2016	1	356	3/1/2017	356	This report amends 100686287 which was filed 3/11/16. The amendment is not a reportable violation.	
3	100750423	C4	Y		5/10/2016	7/1/2016	52	295	3/1/2017	295	This report amends 100704855 which was filed 7/1/16. The amendment is not a reportable violation.	
4	100766735	C4	Y		10/18/2016	10/9/2016	0	233	6/8/2017	233		
5	100750424	C4	Y		7/12/2016	7/14/2016	2	232	3/1/2017	232	This report amends 100708515 which was filed 7/14/16. The amendment is not a reportable violation.	
6	100757884	C4	Y		10/18/2016	10/9/2016	0	195	5/1/2017	195		
7	100750425	C4	Y		9/12/2016	9/13/2016	1	170	3/1/2017	170	This report amends 100720963 which was filed 9/13/16. See complaint # 45. The amendment is not a reportable violation.	
8	100750426	C4	Y		10/18/2016	10/9/2016	0	134	3/1/2017	134		
9	100754494	C4	Y			2/10/2017	3/6/2017	24	54	4/5/2017	54	
10	100754493	C3	Y	1/23/2017	2/10/2017	3/6/2017	24	54	4/5/2017	54		
11	100704855	C4	N Y		5/10/2016	7/1/2016	52	52	3/1/2017	295	Amended by 100750423 on 3/1/17.	
12	100704854	C3	N	4/27/2016	5/10/2016	7/1/2016	52	52		0		
13	100780469	C3	N	6/13/2017	6/19/2017	8/3/2017	45	45		0		
14	100720960	C3	N	8/4/2016	8/8/2016	9/13/2016	36	36		0		
15	100708513	C3	N	5/22/2016	6/6/2016	7/14/2016	38	34		0		
16	100685026	C4	N		2/10/2016	3/9/2016	28	28		0		
17	100684349	C3	N Y	1/22/2016	2/10/2016	3/9/2016	28	28	3/9/2016	0	Amended by 100684350 on 3/9/16 This report amends 100684349 which was also filed on 3/9/16. It is not a reportable violation. See complaint # 17.	
18	100684350	C3	Y	1/22/2016	2/10/2016	3/9/2016	0	28	3/9/2016	28		
19	100739945	C3	N	11/15/2016	12/12/2016	1/6/2017	25	27				
20	100754512	C4	Y		3/10/2017	3/6/2017	0	26	4/5/2017	26	This report amends 100751021 filed on 3/6/17. It is not a reportable violation. This report amends 100751020 filed on 3/6/17. It is not a reportable violation.	
21	100754508	C3	Y	2/27/2017	3/10/2017	3/6/2017	0	26	4/5/2017	26		
22	100739946	C4	N		12/12/2016	1/6/2017	25	25		0		
23	100715527	C3	N	7/14/2016	7/18/2016	8/12/2016	25	25		0		
24	100751006	C4	N Y		2/10/2017	3/6/2017	24	24	4/5/2017	0	Amended by 100754494 on 4/5/17.	
25	100780622	C4	N		7/10/2017	8/4/2017	25	24		0		
26	100735430	C3	N	10/20/2016	10/24/2016	11/16/2016	23	23		0		
27	100720961	C3	N	8/17/2016	8/22/2016	9/13/2016	22	22		0		
28	100704858	C4	N		6/10/2016	7/1/2016	21	21		0		
29	100715842	C4	N		7/26/2016	8/15/2016	20	20		0		
30	100692114	C4	N		4/11/2016	4/29/2016	18	18		0		
31	100692113	C3	N	3/30/2016	4/11/2016	4/29/2016	18	18		0		
32	100735428	C4	N		11/1/2016	11/16/2016	15	15		0		
33	100720962	C3	N	8/23/2016	8/29/2016	9/13/2016	15	15		0		
34	100672590	C4	N		12/10/2015	12/22/2015	12	12		0		
35	100672588	C3	N	11/30/2015	12/10/2015	12/22/2015	12	12		0		
36	100676027	C4	N Y		1/11/2016	1/22/2016	11	11	2/27/2017	413	Amended by 100750044 on 2/27/17.	
37	100676026	C3	N	12/15/2015	1/11/2016	1/22/2016	11	11		0		
38	100780623	C4	N		7/25/2017	8/4/2017	1	10		0	Activity prior to the 7/25/17 due date was less than \$200. Reporting not due until subsequent reporting period.	
39	100724815	C3	N	9/26/2016	10/3/2016	10/9/2016	0	6		0	Activity prior to the 10/3/16 due date was less than \$200. Reporting not due until subsequent reporting period.	
40	100708515	C4	N Y		7/12/2016	7/14/2016	2	2	3/1/2017	232	Amended by 100750424 on 3/1/17.	
41	100741734	C4	N		1/10/2017	1/12/2017	2	2		0		
42	100741736	C3	N	12/15/2016	1/10/2017	1/12/2017	2	2		0		
43	100741735	C3	N	12/15/2016	1/10/2017	1/12/2017	2	2		0		
44	100686287	C4	N Y		3/10/2016	3/11/2016	1	1	3/1/2017	356	Amended by 100750422 on 3/1/17. See complaint #2.	
45	100720963	C4	N Y		9/12/2016	9/13/2016	1	1	3/1/2017	356	Amended by 100750425 on 3/1/17. See complaint #7.	
46	100686286	C3	N	2/24/2016	3/10/2016	3/11/2016	1	1		0		
Total Days							728	2,841				

Exhibit B — Alleged Failure to Timely Report Debt

Item No.	Vendor	Date	Amount	Corrected Amount	Description	Complaint re Debt Reported.	Correction/Explanation to Allegation re Debt Reported	Alleged days late	Approx. Days Late
1	LIBERTY MUTUAL INSURANCE	11/12/2015	\$360.00		LIABILITY INS. FOR 2016	This should have been reported as debt on the 7 day prior to a general election	No requirement for MCDDCC to file a C4 seven days prior to a general election	748	0
2	CITY OF SHELTON	11/5/2015	\$300.00		DAMAGE DEPOSIT FOR ANNUAL HOLIDAY PARTY	This should have been reported as debt on the 7 day pre-general C4.	Full disclosure of this expense was made on the C4 filed 12/22/15.	748	12
3	PHILA HOLDING CO. LLC	3/3/2016	\$942.50		SECURITY DEPOSIT, APPLICATION FEE & PRORATED RENT FOR MARCH 2016	This should have been reported as debt on the C4 covering the time period of February 2016.	The debt should have been reported on the February C4 filed 3/11/16.	582	18
4	PHILA HOLDING CO. LLC	4/1/2016	\$575.00		MONTHLY RENT FOR CAMPAIGN OFFICE	This should have been reported as debt on the C4 covering the time period of March 2016.	The debt should have been reported on the March C4 filed 4/29/16, 18 days late. Instead, it was reported on the C4 filed 7/1/16.	551	18
5	REED ROSLYNNE	5/22/2016	\$226.79	\$258.55	BLANKET GIFT FOR GUEST SPEAKER	This should have been reported as debt on the C4 covering the time period of April 2016.	MCDDCC reported Ms. Reed's 5/22/16 reimbursement for the purchase of a ceremonial blanket gift from KTP Shell for the Kennedy Dinner speaker in C4 (#100704858) filed 7/1/16, 20 days late.	521	20
6	LUCKY DOG CASINO	5/22/2016	\$3,672.00		COST + GRATUITY FOR 2016 KENNEDY DINNER	This should have been reported as debt on the C4 covering the time period of April 2016.	An estimated 100 plates at \$25 per plate should have been reported on the May C4; due 6/10/16 and filed 7/1/16.	521	21
7	PHILA HOLDING CO. LLC	5/22/2016	\$575.00		RENT AT 121 RAILROAD IN SHELTON, WA	This should have been reported as debt on the C4 covering the time period of April 2016.	The debt should have been reported on the April C4 filed 7/1/16, 51 days late.	521	51
8	PHILA HOLDING CO. LLC	6/2/2016	\$575.00		MONTHLY RENT FOR OFFICE	This should have been reported as debt on the C4 covering the time period of May 2016.	The debt should have been reported on the May C4 timely filed 7/1/16. It was reported on the C4 filed 7/14/16.	491	21
9	PHILA HOLDING CO. LLC	8/8/2016	\$575.00		MONTHLY RENT FOR CAMPAIGN OFFICE	This should have been reported as debt on the 7-day pre-primary C4.	No debt due in this filing.	445	1
10	PHILA HOLDING CO. LLC	9/5/2016	\$575.00		MONTHLY RENT	This should have been reported as debt on the post-primary C4.	The September rent was paid on 9/5/16 and reported on the C4 filed 10/9/16. The debt should have been reported on the 21-day post primary C4 which was filed on 9/13/16.	397	1
11	PHILA HOLDING CO. LLC	10/20/2016	\$575.00		MONTHLY RENT	This should have been reported as debt on the 21 day pre-general C4.	The October rent was paid on 10/20/16 and reported on the C4 filed 11/16/16.	361	15
12	CITY OF SHELTON	11/15/2016	\$485.00	\$570.00	RENTAL OF CITY CENTER FOR ANNUAL POTLUCK/VICTORY PARTY	This should have been reported as debt on the 7 day pre-general C4.	Report due 12/12/16, filed 1/6/17.	347	25
13	DOWNTOWN MINI STORAGE	11/15/2016	\$540.00		STORAGE LOCKER FOR 1 YEAR	This should have been reported as debt on the 7 day pre-general C4.	Due 12/12/16 and filed 1/6/17.	347	25
14	PHILA HOLDING CO. LLC	11/15/2016	\$287.50		OFFICE RENT FOR 11/1 TO 11/15/16	This should have been reported as debt on the 7 day pre-general C4.	The debt should have been reported on the seven-day pre-general C4 filed 11/16/16. It was reported on the C4 filed 15 days late.	347	27
15	CAPITOL CITY PRESS	1/23/2017	\$266.81		2000 REMIT ENVELOPES	This should have been reported as debt on the C4 covering the time period of December 2016.	No debt incurred.	277	24
16	LITTLE CREEK CASINO	3/6/2017	\$500.00		DEPOSIT FOR KENNEDY DINNER	This should have been reported as debt on the C4 covering the time period of February 2017.	Report timely filed.	218	0

Exhibit B — Alleged Failure to Timely Report Debt

Item No.	Vendor	Date	Amount	Corrected Amount	Description	Complaint re Debt Reported.	Correction/Explanation to Allegation re Debt Reported	Alleged days late	Approx. Days Late
17	MCLEAN DIANE K	3/6/2017	\$343.00		REIMBURSE FOR 672-700-STAMPS - 2017 DUES REQUEST	This should have been reported as debt on the C4 covering the time period of February 2017.	Report timely filed.	248	0
18	HAMILTON MARCIA	5/21/2017	\$999.00	\$0.00	ISLAMIC WOMAN COLLAGE	This should have been reported as debt on the C4 covering the time period of April 2017.	No debt incurred.	157	0
19	LITTLE CREEK CASINO	7/10/2017	\$4,001.04		FOOD COST FOR KENNEDY DINNER	This should have been reported as debt on the C4 covering the time period of May 2017.	Debt should have been reported on May C4 due 6/12/17, but was filed 7/1/17.	126	19
Total number of days								7864	298

Note: The complainant's Exhibit B alleges 5,128 days cumulative late. However, the complainant's numbers total 7,864. MCDCC's corrections reduce this to 243 cumulative days late.

Exhibit C – Alleged Failure to Break Down Expenditures

Item #	Vendor	Date	Amount	Correction	Description	Alleged Violation	Vendor/Item	Report #	Date Report Submitted		Original Report Days Late (MCDCC)
									Due	Due	
1	WALSH BRIAN	11/13/2015	\$11.00		REPAYMENT FOR LIQUOR PERMIT AT ANNUAL HOLIDAY PARTY	Failure to identify subvendor.	Washington State Liquor & Cannabis Board, 3000 Pacific Avenue SE Olympia, WA 98504	100672590	12/10/2015	12/22/2015	12
2	KING LARRY	12/9/2015	\$58.07		BEVERAGES FOR 2015 HOLIDAY PARTY	Failure to identify subvendor.	Safeway, 600 Franklin Street, Shelton, WA 98584	100750044	1/11/2016	1/22/2016	11
3	REED ROSLYNNE	12/9/2015	\$98.00		POSTAGE FOR 215 ITEMS	Failure to identify subvendor.	US Post Office, Union, WA 98592	100750044	1/11/2016	1/22/2016	11
4	ROUSH JANE	12/9/2015	\$108.78		POSTAGE FOR 222 MAILERS	Failure to identify subvendor.	US Post Office, 218 Mark E Reed Way, Unit Main, Shelton, WA 98584	100750044	1/11/2016	1/22/2016	11
5	KING LARRY	2/4/2016	\$90.78		CAMPAIGN BUTTON BLANKS	Failure to identify subvendor.	1000 Blanks Purchased. Tecre Company Inc., W5747 Lost Arrow Road, Fond du Lac, WI 54937-9296	100750422	3/10/2016	3/11/2016	1
6	KING LARRY	2/4/2016	\$88.00		RV PARK FEES FOR WSDCC MEETING IN WENATACHEE	Failure to identify subvendor.	Lake Pleasant RV Park, 24025 Bothell Everett Hwy SE, Bothell, WA 98021	100750422	3/10/2016	3/11/2016	1
7	REED ROSLYNNE	2/4/2016	\$45.62		THUMB DRIVES FOR PCOS	Failure to identify subvendor.	Office Depot Store 911, 602 Sleater Kinney Rd, SE, Lacey, WA 98503	100750422	3/10/2016	3/11/2016	1
8	REED ROSLYNNE	3/8/2016	\$40.99		POSTCARDS FOR DUES REMINDER MAILING	Failure to identify subvendor.	Office Depot Store 911, 602 Sleater Kinney Rd, SE, Lacey, WA 98504	100692114	4/11/2016	4/29/2016	18
9	REED-ROSLYNNE	3/11/2016	\$21.08		3-THUMB DRIVES	Failure to identify subvendor.	The Shopper, 2505 Olympic Hwy N 220 B, Shelton, WA 98584	100692114	4/11/2016	4/29/2016	18
9	KING, LARRY	3/11/2016	\$13.66		10 PLASTIC ENVELOPES		Walmart, 100 E Wallace Kneeland Blvd, Shelton, WA 98584	100692114	4/11/2016	4/29/2016	18
9	KING, LARRY	3/11/2016	\$4.19		PAINT FOR OFFICE CABINET		Bark & Garden Center, 4004 Harrison Ave NW, Olympia, WA 98502	100692114	4/11/2016	4/29/2016	18
9	KING, LARRY	3/11/2016	\$3.23		3 USA FLAGS FOR CAUCUS			100692114	4/11/2016	4/29/2016	18
10	MGLEAN KATHERINE	4/1/2016	\$14.40		POSTAGE FOR MONTHLY NEWSLETTER	Failure to identify subvendor.	US Post Office, 218 Mark E Reed Way, Unit Main, Shelton, WA 98584	100750423	5/10/2016	7/1/2016	52
11	WALSH BRIAN	4/1/2016	\$27.21		KEYS FOR TREASURER'S FILE CABINET	Failure to identify subvendor.	Always Safe & Lock, 815 East Fourth Ave Olympia, WA 98506	100750423	5/10/2016	7/1/2016	52
12	KING LARRY	5/22/2016	\$11.66	\$88.67	KEYS FOR OFFICE DOORS AT 121 RAILROAD IN SHELTON	Failure to identify subvendor.	Olympic Lock and Key, 2201 Olympic Hwy N, Shelton, WA 98584	100704858	6/10/2016	7/1/2016	21
12	KING, LARRY	5/22/2016	\$12.82		COFFEE AND CREAMER		Safeway, 600 Franklin Street, Shelton, WA 98584	100704858	6/10/2016	7/1/2016	21
12	KING, LARRY	5/22/2016	\$17.16		PAPER TOWELS		Costco, 5500 Litterlock Road SW, Tumwater, WA 98512	100704858	6/10/2016	7/1/2016	21

Exhibit C – Alleged Failure to Break Down Expenditures

Mason County Democratic Central Committee											
Item #	Vendor	Date	Amount	Correction	Description	Alleged Violation	Vendor/Item	Report #	Date Report Due	Date Report Submitted (MCDCC)	Original Report Days Late (MCDCC)
12	KING, LARRY	5/22/2016		\$3.11	FASTENERS		Probuild, 114 E Cedar St, Shelton, WA 98584	100704858	6/10/2016	7/1/2016	21
13	MCLEAN KATHERINE	5/22/2016	\$20.47		COFFEE & COOKIES FOR MONTHLY MEETING	Failure to identify subvendor.	QFC Belfair, 201 NE State Rte 300, Belfair, WA 98528	100704858	6/10/2016	7/1/2016	21
14	MCLEAN KATHERINE	5/22/2016	\$25.00		REIMBURSEMENT FOR RENTAL OF ROOM IN ALLYN FOR MEETING	Failure to identify subvendor.	Port of Allyn, 18560 WA-3, Allyn, WA 98524	100704858	6/10/2016	7/1/2016	21
15	REED ROSLYNNE	5/22/2016	\$258.55	\$226.79	BLANKET GIFT FOR GUEST SPEAKER	Failure to identify subvendor.	KTP Shell, 61 West Hwy 108, Shelton, WA 98584	100704858	6/10/2016	7/1/2016	21
16	REED ROSLYNNE	5/22/2016	\$50.44	\$35.00	POSTAGE FOR 2016 KENNEDY DINNER INVITATIONS	Failure to identify subvendor.	US Post Office, Union, WA 98592	100704858	6/10/2016	7/1/2016	21
16	REED ROSLYNNE	5/22/2016		\$15.14	FEDEX GROUND		Zeppelin Shipping & Tech Ctr, 625 W Railroad Ave, Shelton, WA 98584	100704858	6/10/2016	7/1/2016	21
17	REED ROSLYNNE	5/22/2016	\$144.99		PRINTING ASSOCIATED WITH 2016 DINNER & AUCTION	Failure to identify subvendor, failure to identify number of items printed.	Office Depot Store 911, 602 Sleater Kinney Rd, SE, Lacey, WA 98503	100704858	6/10/2016	7/1/2016	21
18	ROUSH JANE	7/14/2016	\$141.00		REIMBURSE FOR SUMMER 2016 ASK POSTAGE	Failure to identify subvendor.	US Post Office, 218 Mark E Reed Way, Unit Main, Shelton, WA 98585	100715842	7/26/2016	8/15/2016	20
19	KING LARRY	8/18/2016	\$113.06		REIMBURSEMENT FOR OFFICE SUPPLIES	Failure to identify subvendor.	1000 Blanks Purchased, Tecre Company Inc., W5747 Lost Arrow Road, Fond du Lac, WI 54937-9296	100750425	9/12/2016	9/13/2016	1
19	KING, LARRY	8/18/2016		\$91.31	BUTTON BLANKS		54937-9296	100750425	9/12/2016	9/13/2016	1
19	KING, LARRY	8/18/2016		\$21.75	BATTERY FOR PHONE		Battery Plus, 2905 Capital Mall Drive SW, Olympia, WA 98502	100750425	9/12/2016	9/13/2016	1
20	KING LARRY	10/16/2016	\$125.05	\$100.00	OFFICE SUPPLIES-BUTTON BLANKS	Failure to identify subvendor.	Tecre Company Inc., W5747 Lost Arrow Road, Fond du Lac, WI 54937-9296	100766735	10/10/2016	10/9/2016	0
20	KING, LARRY	10/16/2016		\$4.34	COPY PAPER		Safeway, 600 Franklin Street, Shelton, WA 98584	100766735	10/10/2016	10/9/2016	0
21	KING LARRY	12/15/2016		\$60.76	Beverages for 2016 Holiday Party	Failure to identify subvendor.	Safeway, 600 Franklin Street, Shelton, WA 98584	100741734	1/10/2017	1/12/2017	2
22	WALSH BRIAN	12/15/2016	\$24.44		CITY DUMP FEE FOR SOFA Reimbursement for printer toner cartridges, printer paper, dividers, labels	Failure to identify subvendor.	Mason County Landfill, 501 W Feils Hill Rd, Shelton, WA 98584	100741734	1/10/2017	1/12/2017	2
23	MCLEAN DIANE K	3/6/2017	\$142.53			Failure to identify subvendor.	Office Max, 21800 Market Pl NW, Poulsbo, WA 98370	100754522	4/10/2017	4/5/2017	0

Exhibit C – Alleged Failure to Break Down Expenditures

Mason County Democratic Central Committee											
Item #	Vendor	Date	Amount	Correction	Description	Alleged Violation	Vendor/Item	Report #	Date Report Submitted (MCDCC)	Original Report Days Late (MCDCC)	
								Due	Submitted	Report	
24	MCLEAN DIANE K	3/6/2017	\$343.00		REIMBURSE FOR 677 700 STAMPS - 2017 DUES ASK	Failure to identify subvendor.	US Post Office, 218 Mark E Reed Way, Unit Main, Shelton, WA 98584	100754522	4/10/2017	4/5/2017	0
25	O'DONNELL MARLAYNA	3/9/2017	\$60.60		REIMBURSE FOR SUPPLIES FOR 2017 DUES ASK	Failure to identify subvendor.	Fred Meyer, 301 E Wallace (Kneeland Blvd), Shelton, WA 98584	100754522	4/10/2017	4/5/2017	0
26	HAMILTON MARCIA	6/6/2017	\$40.49		POSTCARDS FOR KENNEDY DINNER	Failure to identify subvendor.	STAPLES, Silverdale WA 2850 NW Bucklin Hill Road, Silverdale WA 98383	100780622	7/10/2017	8/4/2017	25
27	HAMILTON MARCIA	6/6/2017	\$37.99		BLACK INK CARTRIDGE	Failure to identify subvendor.	HP (Hewlett Packard) 1501 Page Mill Road, Palo Alto California 95304	100780622	7/10/2017	8/4/2017	25
28	HAMILTON MARCIA	6/6/2017	\$41.99		COLORED INK CARTRIDGES	Failure to identify subvendor.	HP (Hewlett Packard) 1501 Page Mill Road, Palo Alto California 95304	100780622	7/10/2017	8/4/2017	25
29	HAMILTON MARCIA	6/6/2017	\$57.49		AUCTION SLIPS FOR KENNEDY DINNER	Failure to identify subvendor, failure to identify number of items printed.	125 auction slips printed. Northwest Benefit Auctions 7212 Mission Rd. Everson WA 98247	100780622	7/10/2017	8/4/2017	25
30	MCLEAN DIANE	6/28/2017	\$150.00		ALLYN DAYS BOOTH RENTAL REIMBURSEMENT	Failure to identify subvendor.	Allyn Community Association, 220 E Cronquist Rd., Allyn, WA 98524	100780622	7/10/2017	8/4/2017	25
31	MCLEAN KATHERINE	8/10/2017	\$24.93		OFFICE SUPPLIES REIMBURSEMENT	Failure to identify subvendor.	Staples, 1805 SE Lund Ave., Port Orchard, WA. 100 items printed.	100786274	9/11/2017	9/11/2017	0
32	MCLEAN KATHERINE	8/10/2017	\$49.00		STAMPS REIMBURSEMENT	Failure to identify subvendor.	US Post Office, 218 Mark E Reed Way, Unit Main, Shelton, WA 98584	100786274	9/11/2017	9/11/2017	0
33	MCLEAN KATHERINE	8/10/2017	\$113.47		PRINTING REIMBURSEMENT FOR ALLYN DAYS	Failure to identify subvendor, failure to identify number of items printed.	100 items printed. Staples, 1805 SE Lund Ave., Port Orchard, WA. 100 items printed.	100786274	9/11/2017	9/11/2017	0
34	MCLEAN KATHERINE	8/10/2017	\$55.37		CHAIRS FOR ALLYN DAYS BOOTH	Failure to identify subvendor.	Three chairs purchased. Fred Meyer, 1900 SE Sedgewick Rd, Port Orchard, WA 98366	100786274	9/11/2017	9/11/2017	0
Total								\$2,116.37	\$ 637.17	Total Days	604