

[shelly@vote4shelly.com](mailto:shelly@vote4shelly.com) (Mon, 6 Nov at 12:10 PM)

to : pdc@pdc.wa.gov

Mr. Blackhorn,

This response is in regard to PDC Case Number 26423.

Allegation One: failure of my consulting company to register as a political committee.

The ROC Foundation is the name of my consulting company. I consult with political candidates and help them with their campaigns. I am not registered with the Secretary of State because I am not a corporation. I am a sole proprietorship, Doing Business As "The ROC Foundation." I have a business license with Washington State and my current registration is "Active". I would be happy to provide you with my Unified Business ID Number if you should need it. Therefore, I am not a political committee and do not need to file a C1-pc form.

Allegation Two: failure for my consulting company to file C-3 and C-4 forms.

As stated above, I am a sole proprietor doing business as "The ROC Foundation". I consult with political candidates and they hire me to do work for them. The Complainant included a spreadsheet with payments made by campaigns to my business. Under the description header, you can see the payments were made for campaign work I provided to the campaign or political committee. These payments were not "contributions" to a political organization. They were payments for services that I rendered to the various campaigns.

Therefore, I am not required to file C-3 nor C-4 forms with the PDC.

If you have any further questions, please contact me.

Mitch Short