

September 13, 2017

Micaiah Titus Ragins
Compliance Coordinator
Public Disclosure Commission

Re: Response to PDC Complaint # 24575 against Pam Carter

Dear Mr. Ragins,

Thank you for allowing me the additional time to compile the documents and information you need to address my alleged violations.

1) Violation of RCW 42.17A.710 for failure to disclose offices held on the F-1 personal financial affairs statement

Regarding the Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC):
According to guidance issued earlier this year by the PDC, I am not required to disclose on my F-1 Supplement. I do not receive any compensation from my position on MWPAAC and I was appointed by resolution as the representative of the Valley View Sewer District. *See attached Resolutions 2015-4 and 2016-5.*

“The Public Disclosure Commission issued guidance for filers at their public meeting on May 25, 2017 indicating that if elected or appointed officials serve on boards as part of their official duties pursuant to agreements, resolutions, or other legal obligations – they are not required to disclose their membership on an F-1 Supplement unless they receive additional income in excess of \$2,400.” – from compliance case 21153 compliant return letter to Alyne Fortgang.

For the record, a more accurate description of MWPAAC as shown at <http://www.kingcounty.gov/services/environment/wastewater/mwpaac.aspx> is:

“The Metropolitan Water Pollution Abatement Advisory Committee, or MWPAAC, advises the Metropolitan King County Council and the King County Executive on matters related to water pollution abatement.

It was created by state law (RCW 35.58.210) and consists of representatives from cities and local sewer utilities that operate sewer systems within King County's service area.”

Regarding the Public Works Board:

At the March 28, 2014 Public Works Board meeting, PDC's Lori Anderson advised Board members that we did not have to list the Public Works Board on our F-1 Supplements.

Furthermore, it was clearly explained at the May 25, 2017 Public Disclosure Commission Meeting, that if citizen members of the board are not required to file an F-1, than the elected officials serving on that board are not required to list the board on their F-1 Supplements. The PWB's Commission Profile on Governor Inslee's website indicates that membership on the Public Works Board does not require filing of an F-1.

The screenshot shows the website for the Public Works Board. The main content area displays the following information:

- Public Works Board**: Provides financial and technical assistance to Washington communities for critical public health, safety, and environmental infrastructure that supports community at economic vitality. The Board administers four programs associated with the Public Works Trust Fund, the Drinking Water State Revolving Fund program, and the Water System Acquisition and Rehabilitation Program.
- Board Website**: <http://www.pwb.wa.gov/pages/default.aspx>
- Policy Area**: Working Washington
- Governor Appointments**: 13
- Total Board Positions**: 13
- Statutory Authority**: RCW 43.155.030
- Statutory Authority Website**: <http://apps.leg.wa.gov/RCW/default.aspx?cite=43.155.030>
- Public Disclosure Required?**: No
- Senate Confirmation Required?**: No
- Compensation**: Reimbursement of expenses
- Term Length (years)**: 4
- Statutory Term Limits**: (None listed)
- Board Requirements**: The board shall be composed of thirteen members appointed by the governor. Two elected officials and one public-works manager nominated by Assn. of Washington Cities, two elected officials and one public-works manager nominated by the Assn. of Counties, three nominated jointly by the Assn. of Water Districts, the Public Utilities Districts Assn., and the Assn. of Severer Districts, four general public including special expertise in fields such as public finance, architecture and civil engineering, and public works construction. Governor appoints chair from public member, whose term coincides with Governor.

Regarding the collection in excess of \$12K annually for "professional services" from WASWD

I have never been employed by nor received any compensation from WASWD. However my F-1 Supplement correctly shows that MRSC has received payments from WASWD.

2) Violation of RCW 42.17A.555 for failure to check the F-1 acknowledgement box regarding the prohibited misuse of public money for campaign purposes.

As shown on the PDC website, my F-1 filed on 4/14/2015, shown as report 100618986, does have the box checked. However, I did see that I failed to check the box on the form filed on 4/11/2016, shown as report 100686633. I have therefore amended that report.

I have always tried to correctly fill out my F-1 and Supplement forms and will now be especially careful to check the box I missed on the one form.

To conclude, given the PDC training, materials, and Commission meetings, I believe this letter and supporting documents will suffice to show that, other than not checking a box, I did not make any other of the alleged errors or omissions on my F-1 or F-1 Supplement.

Thank you, and I look forward to your response.

Sincerely,

Pam Carter

VALLEY VIEW SEWER DISTRICT

RESOLUTION 2016-5

A RESOLUTION of the Board of Commissioners of Valley View Sewer District, confirming the District's appointment of MWPAAC representatives and alternates for the calendar year 2017 and amending Resolution 2015-4.

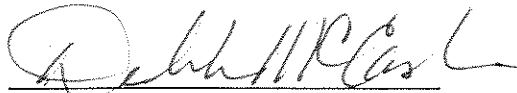
WHEREAS, Valley View Sewer District participates in and sends representatives to the Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC); and,

WHEREAS, the Commissioners want to confirm the appointment of Board representatives to MWPAAC; now therefore,

BE IT RESOLVED by the Board of Commissioners that the appointment of the following representatives and alternate representatives for the year 2017 is hereby confirmed:

<u>ORGANIZATION</u>	<u>MEETING DAY</u>	<u>REPRESENTATIVE</u>	<u>ALTERNATES</u>
MWPAAC	1 st Wednesday	Pam Carter Commissioner	Michael West Commissioner Deborah McCaslin Commissioner Andrew LaRue Assistant Manager Dana Dick General Manager

ADOPTED by the Board of Commissioner of Valley View Sewer District, King County, Washington, at its regular meeting held December 20th, 2016.



President
Deborah McCaslin



Vice-President
Michael J. West



Secretary
Pam Carter

VALLEY VIEW SEWER DISTRICT

RESOLUTION 2015-4

A RESOLUTION of the Board of Commissioners of Valley View Sewer District, confirming the District's appointment of MWPAAC representatives and alternates for the calendar year 2016 and amending Resolution 2014-10.

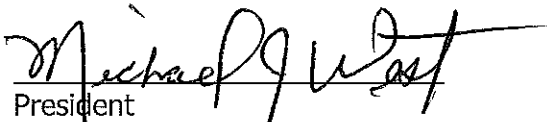
WHEREAS, Valley View Sewer District participates in and sends representatives to the Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC); and,

WHEREAS, the Commissioners want to confirm the appointment of Board representatives to MWPAAC; now therefore,


BE IT RESOLVED by the Board of Commissioners that the appointment of the following representatives and alternate representatives for the year 2015 is hereby confirmed:

<u>ORGANIZATION</u>	<u>MEETING DAY</u>	<u>REPRESENTATIVE</u>	<u>ALTERNATES</u>
MWPAAC	1 st Wednesday	Pam Carter Commissioner	Michael West Commissioner Deborah McCaslin Commissioner Dana Dick General Manager Andrew LaRue Assistant Manager


ADOPTED by the Board of Commissioner of Valley View Sewer District, King County, Washington, at its regular meeting held December 15th, 2015.



President
Michael J. West



Vice-President
Pam Carter
Secretary
Pam Carter



Secretary
Deborah McCaslin