

Jay Petterson, Treasurer
Mass Transit Now
119 1st Avenue South
Suite 320
Seattle, WA 98104

May 5, 2017

Public Disclosure Commission
pdcc@pdcc.wa.gov

Re: Glen Morgan Complaint

To Whom It May Concern:

This letter responds to the complaint from Mr. Glen Morgan that the Commission received on April 24, 2017. Mr. Morgan alleges that Mass Transit Now (the Committee) has violated certain registration and reporting requirements. Below I address each of the alleged violations identified in Mr. Morgan's complaint.

1. Statement of Organization/C1PC.

The Committee filed the C1PC within two weeks of organizing the campaign committee. The masstransitnow.com domain initially was purchased by Transportation Choices Coalition, an independent non-profit organization, and not used for Committee purposes. Funds raised via this domain went to Transportation Choices Coalition until June 2016. At that time, the Committee began using the domain to fundraise for the campaign and began paying for the domain. This was after the Committee had already filed its C1PC.

2. Filing of C3 & C4 reports on day C1PC is filed.

There were no expenses, debt, contributions or pledges received at the time the C1PC was filed on 10/30/2015. Again, the masstransitnow.com domain was not a Committee expenditure.

3. Timely and accurate C3 & C4 reports.

- A. The Committee amended its July 2016 C4 report timely after being notified by Transportation Choices Coalition that TCC had made \$600 worth of in-kind contributions during that reporting period. These in-kind contributions did not affect the cash balance that was reported on the original C4 report filed 8/10/2016.
- B. When the Committee filed its December 2016 C4 report it did not have enough remaining funds to fully reimburse Dow Constantine for costs incurred for the campaign. It was anticipated at the time that no further contributions would be

received. As a result, the balance owed became an in-kind contribution from Dow Constantine to the Committee on the original December 2016 C4 filing. However, on January 25, 2017, the Committee received an unexpected refund check that was reported on a 2/9/2017 C3 report. The Committee then used those funds to pay Dow Constantine for the remaining balance of his reimbursement request. The December 2016 C4 report was amended to remove the in-kind contribution from Dow Constantine and reported that same amount as debt. The remaining balance paid to Dow Constantine was reported on the 2/9/2017 C4 report.

4. Occupation and employer information for donor.

Martha Wyckoff made an online contribution to the Committee on 10/13/2016. At that time, she entered her occupation and employer as self/Farmer. The Committee reported the donor information and contribution received accordingly. Mr. Morgan appears to confuse community involvement and investment with a person's occupation and employment. The website he references indicates that Ms. Wyckoff raises hay.

5. Timely and accurate reporting of debt.

The Committee timely reported all debt items on each monthly 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 Committee's previous C4 report, without explanation. A review of the Committee's C4 reports shows that the Committee timely reported debt items and expenditures on each report. Debt items reported are inclusive of all debt owed by the Committee during the respective reporting period. Also, some of the expenditures Mr. Morgan complains about actually were reported when he says they should have been (for example, the three \$6,000 payments to Pacifica Public Affairs made on 5/27 were actually listed on the Committee's April C4 report).

6. Expense descriptions.

The description of each campaign expenditure at issue is identified in our campaign reports. The reports identified the specific purpose of each expenditure, such as direct mail productions, equipment rentals, and sticker printing. More detail can be provided upon request.

7. Mailing list.

The Committee paid Win/Win Action for access to the Voter Activation Network software to obtain voter information. \$5,000 was paid on 6/29/2016. Win/Win Action also made an in-kind contribution of \$6,000 to the Committee on 10/20/2016 for this same purpose. Both the payment and the in-kind contribution were accurately reported on the Committee's June and Pre-General 7-Day C4 reports as for "Software Rental."

8. Northwest Passage Consulting as a service provider.

No individual at Northwest Passage had spending authority for the campaign, nor did Northwest Passage have such authority. Northwest Passage was a vendor that produced mailers for the campaign. Abigail Doerr, who is not affiliated with Northwest Passage Consulting, is listed on the C1PC as the Committee's campaign manager. Ultimate spending authority and final approval was the responsibility of Joseph Woods who is listed as an officer on the Committee's C1PC.

9. Northwest Passage Consulting services.

No individual at Northwest Passage had spending authority for the campaign, nor did Northwest Passage have such authority. Northwest Passage was a vendor that produced mailers for the campaign. Abigail Doerr is listed on the C1PC as the Committee's campaign manager. Ultimate spending authority and final approval were the responsibility of Joseph Woods who is listed as an officer on the Committee's C1PC.

10. Mileage reimbursement.

Individuals seeking reimbursement for mileage were required to submit a reimbursement request form that detailed the miles being submitted for reimbursement. Those individuals were reimbursed accordingly and the record of their miles and reimbursement requests are in the campaign's records. An example has been provided.

MASS TRANSIT NOW

119 1ST AVE S STE 320
SEATTLE WA 98104-3424

1100

19-2/1250 WA
99089

10/14/16

Date

Pay To The
Order Of

Evan Smith

\$

202.08

Two Hundred Two + 08/100

Dollars



Security
Features
Details on
Back.

Bank of America



ACH R/T 125000024

For

Mileage Reimbursement

JEHSON

MP

Mileage Form

Name

Evan Smith

Address

900 N 75th St
Seattle, WA 98103

October
2016

(as of
10/11)

Mileage

Date

Origin/Waypoints/Destination (indicate one-way or round trip)

Mileage

10/3

Pacific Grill → NWLF → NEC Debate

2.7 mi

10/5

RAMP → AA (lit) → DOT6

5.1 mi

10/10

TCC → Lakewood → Puyallup → Tacoma

72 mi

10/11

Laborers 252 → jobsign → DOT6

10.9 mi

10/11

Puget Sound Pizza

\$48.77

TOTAL MILES:

90.7

2016 Rate: \$0.54 per mile

TOTAL REIMBURSEMENT:

\$48.98

$\times 0.54 =$

+48.77

\$97.75



I certify that each expense claimed here is for a lawful campaign purpose.

Signature of Submitter:

Administrative Approval

Mileage Form

Name

Evan Smith

Address

900 N 75th St
 Seattle, WA 98105

As of
 October 14th

Mileage

Date	Origin/Waypoints/Destination (indicate one-way or round trip)	Mileage
10/12	Sign → Safeway → DOT6	2.4 mi
10/12	balanga Thai (Vol Food)	\$33.70
10/13	Puget Sound Pizzer	\$21.37
10/13	TCC → DOT6	34 mi
10/14	Alex → Murano	40 mi
10/14	Murano Parking	\$8

TOTAL MILES:

76.4

2016 Rate: \$0.54 per mile

TOTAL REIMBURSEMENT:

$76.4 \times 0.54 = 41.26 + 63.07 \rightarrow$

\$104.33

☐ I certify that each expense claimed here is for a lawful campaign purpose.

Signature of Submitter:

Administrative Approval