

November 20, 2019

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Tabatha Blacksmith, Compliance Coordinator
Public Disclosure Commission
PO BOX 40908
Olympia, WA 98504

Re: PDC Case Number 59777

Dear Ms. Blacksmith:

We write on behalf of Common Purpose (the “*Committee*”). We are in receipt of the complaint filed by Glen Morgan, which has been assigned Public Disclosure Commission (“*PDC*”) Case Number 59777 (the “*Complaint*”).

While the Committee is registered with the Federal Election Commission (“*FEC*”) as a federal hybrid PAC (FEC ID: C00682211), it is organized and operated out of Seattle, Washington.¹ Accordingly, unlike other federal PACs engaging in state or local election activity in Washington, the Committee does not qualify as an “out-of-state committee.”² Given these facts, we contacted Kurt Young at the PDC to confirm the Committee’s reporting obligations.

Mr. Young advised the Committee to file ongoing C-3 and C-4 reports with the PDC through the end of the 2019 election, disclosing its in-state activity. Mr. Young also advised the Committee to file a C-5 report given its status as a federal PAC. On October 28, 2019, the Committee filed its 7-day Pre-General Election C-4 report.³ On November 4, 2019, the Committee filed its C-3 report,⁴ and on November 5, 2019, the Committee filed its C-5 report.

In filing its C-4 report on October 28, the Committee inadvertently omitted a debt owed for a direct mail piece supporting four local candidates. The Committee has since corrected this omission through an amended C-4 report. The Complaint characterizes this omission as “purposely misleading” and “an attempt to conceal their political activities from the PDC and the public” but that is simply not the case. Three of the four candidates who benefited from the mailer disclosed an in-kind contribution from the Committee on their own campaign finance

¹ FEC Form 1, Statement of Organization for Common Purpose (filed Jul. 5, 2018), <https://docquery.fec.gov/pdf/886/201807059115239886/201807059115239886.pdf>.

² Wash. Admin. Code § 390-16-043.

³ 7-day Pre-General Election C-4 report, Common Purpose (filed Oct. 28, 2019), <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100941144>,

⁴ C-3 report, Common Purpose (filed Nov. 4, 2019), <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100943579>.

reports to account for the costs of the mailer.⁵ Moreover, not only did the Committee disclose its top five donors on the mailer itself,⁶ all of the Committee's campaign finance information can be found on the FEC's publicly-available website.⁷ Finally, the C-5 report filed on November 5 disclosed the in-kind contributions for the mailers to the four local candidates. Put simply, the Committee's omission was not an attempt at hiding its activities or shielding this information from the public and the Complaint's accusations to this effect are baseless.

Given the relatively low cost associated with these mailers and for the additional reasons discussed herein, the PDC should dismiss the Complaint and take no further action on this matter. If you require any additional information from the Committee, please let us know.

Sincerely,



Courtney T. Weisman
Jonathon S. Berkon
Counsel to Common Purpose PAC

⁵ See, e.g., <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100942035>,
<http://web.pdc.wa.gov/rptimg/default.aspx?repno=100942382>,
<http://web.pdc.wa.gov/rptimg/default.aspx?repno=100942365>.

⁶ Compl. at 5.

⁷ <https://www.fec.gov/data/committee/C00682211/>.