

Michael Lilliquist
replied to
"PDC Support" <pdcc@pdc.wa.gov>
a day ago (Thu, 8 Nov 2018 at 4:04 PM)
Subject: PDC Case 34558

PDC Compliance Office,

Thank you for this opportunity to respond to the allegations. Let me begin by saying that it is difficult to respond when the allegation lack any specifics. It is hard to respond either positively or negatively, when it is unclear what specific actions or non-actions are alleged to have occurred. At this point, my only knowledge of the alleged violations is the bare citations of the certain passages in the revised code of Washington. No specific allegations were provided to me. I will organize my reply accordingly.

Allegation One: Violation of RCW 42.17A.235 for failure to timely and accurately file C-3 and C-4 reports.

Response: My opponent had pretty much dropped out of the race, and so there was relatively little campaign activity to report. I believe all expenditures and fundraising were reported across a series of a dozen or more reporting periods. I recall that we also submitted a couple of amended reports, in order to keep the record accurate and up-to-date. My recollection is that we filed the required reports on time, and that later submissions were amendments to previous timely reports. However, please see response to allegation five, below: I do not know how to use the Orca program, and so I would need someone else who does know how to use the program to review the records. I cannot say for certain that every transaction was properly reported.

Allegation Two: Violation of RCW 42.17A.265 for failure to report last minute contributions.

Response: My opponent had pretty much dropped out of the race, and we ceased all fundraising early in the campaign. There were no contributions to report in the final reporting periods, and so none were reported. The reporting record is accurate, to the best of my knowledge.

Allegation Three: Violation of RCW 42.17A.205 for failure to list committee officers and update C-1pc.

Response: My campaign did not have any officers, other than myself and the treasurer (again, my opponent did not campaign, and so it was a minimal campaign on my part). No other officers were reported, because no other officers existed. The record is complete.

Allegation Four: Violation of RCW 42.17A.425 for unauthorized expenditures of funds by an individual not listed as an officer on form C-1/C-1pc.

Response: All expenditures were authorized by me personally, as the candidate, and by no other person. Section 425 explicitly empowers the candidate to approve expenditures.

Allegation Five: Violation of RCW 42.17A.235 for failure to preserve books of accounts and campaign finance records.

Response: I retain all digital files pertaining to Orca reporting system, as well as Excel spreadsheets relating to those Orca records. The records have been maintained. They are available to anyone who

asks. No one has asked to see the records. I do not know how to use the Orca program, and so I cannot personally inspect the records.

Allegation Six: Violation of RCW 42.17A.220 for unauthorized depositing of campaign funds into bank account by a non-treasurer.

Response: All funds were deposited by me personally, as the candidate. Deposits by the candidate is explicitly authorized under Section 220.

Allegation Seven: Violation of RCW 42.17A.320 for failure to include Sponsor ID.

Response: The allegation does not say where this "failure" is alleged to have occurred. The required "sponsor" declaration was shown on the website and on all printed materials for the campaign, in full compliance with Section 320.

Allegation Eight: Violation of RCW 42.17A.255 for failure to timely file C-6 independent expenditures.

Response: I am unaware of any independent expenditures made on behalf of my candidacy, and therefore none was reported. Moreover, my understanding is that the duty to report belongs to the party making the expenditure, not the candidate. Therefore, this allegation is void as it pertains to my campaign.

The foregoing responses are true to the best of my knowledge.

It is also remarkable that the complainant has never spoken with me, never asked for information, never asked to see my records, nor attempted to communicate with me in any way. As far as I know, Mr. Morgan has never been to Bellingham or Whatcom County, and has never spoken with me in any capacity whatsoever. Perhaps if Mr. Morgan had contacted me, I could have provided information that would have addressed his concerns.

Please acknowledge safe receipt of this message. Thank you.

Sincerely,

Michael Lilliquist