

[Mcobb](#) replied (Sat, 28 Apr at 12:59 PM)

to : pdcc@pdcc.wa.gov

Micaiah Titus Ragins

Compliance Coordinator

Public Disclosure Commission

RE: PDC Case Number 34458

I am in receipt of the complaint generated by Glen Morgan and find all but one allegation to be a baseless “fishing expedition”, to put it politely. My response will be addressed in the order of the allegations.

I Allegation One: Violation of RCW 42.17A.235 for failure to timely and accurately file C-3 and C-4 reports: the C-3 and C-4 reports were filed as a combination of paper and electronic filings in the ORCA system. Most were completed and submitted on a timely basis. The only significant timing issue was with the final C-4 report, which was prepared in my computer but failed to upload in the ORCA system at the PDC until today, April 24, 2018. After review with Chip Beatty, your PDC expert with the ORCA system, the final report was uploaded as prepared prior to the Dec 11 deadline.

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

There were no last minute contributions.

III. Allegation Three: Violation of RCW 42.17A.205 for failure to list committee officers and update C-1pc.: I was the only committee officer listed, and served as Treasurer as well.

IV. 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.: There were no unauthorized expenditures. In one instance, I authorized an individual to place a newspaper advertisement that required an immediate payment for the ad to run on time. I specifically authorized that expenditure and immediately reimbursed the individual placing the ad.

V. Allegation Five: Violation of RCW 42.17A.235 for failure to preserve books of accounts and campaign finance records: All campaign books and account records are complete and will be held by me for the required time.

VI. Allegation Six: Violation of RCW 42.17A.220 for unauthorized depositing of campaign funds into bank account by a non-treasurer: All deposits were made by me to the campaign bank account.

VII. Allegation Seven: Violation of RCW 42.17A.320 for failure to include Sponsor ID.: Sponsor ID was included on all appropriate items promoting the campaign.

VIII. Allegation Eight: Violation of RCW 42.17A.255 for failure to timely file C-6 independent expenditures: There were no independent expenditures.

The errors noted in Allegation One were certainly not intentional or done with malice. I am forwarding a copy of this response to the Washington State Attorney General's office for their consideration regarding any future actions.

Sincerely
Michael Cobb