

**Rising Tide Consulting** reported via email

*Wed, 7 Jun 2023 at 1:02 PM*

To: "PDC Support" <pdcc@pdcc.wa.gov>  
Cc: campaign@betsywilkerson.com

External Email

Thank you for reaching out and giving us the opportunity to respond to this complaint.

Please let me start by saying that I am a new treasurer and this is my first experience with a lot of the things mentioned here. I will address each portion of the complaint the best I can. If there is anything else that I need to fix or that I fixed incorrectly please let me know, I want to get this right for everyone involved.

1. As for the \$3,254.89 on the original March 2023 C-4 report- This was the dollar amount starting in our bank account. As I was taking over the campaign from another treasurer in February of 2023, I had an oversight and assumed that the amount in the account had been approved by donors from the 2021 campaign. However, only \$1,020 was approved by past donors, and due to the new guidance from the pdc on May 11th, I have added them all as new donors to the 2023 campaign on the C-3 from 6/7 (attached). I have also attached the spreadsheet that shows which donors had previously approved their carry over to support these donations.

In September of the 2021 City Council campaign, the Wilkerson campaign received a \$1,000 check from Delta Dental when the limit was at \$500 post primary. The campaign reported the \$500 donation and wrote a check to refund the additional \$500 to Delta Dental, but the check was never cashed. Because of this the campaign had \$3,266.89 in the bank account when the PDC showed \$2,766.89 with that \$500 refund in process. On February 27, 2023, the campaign purchased the domain for the 2023 Council President campaign at a rate of \$12 (reimbursement payment to Riley Smith). This now showed the bank account at \$3,254.89 (\$488 more than the 2021 campaign closing amount- pointed out in the complaint). There was a communication error on my part and I should have reported this as a 2023 expense, but for some reason I believed it would be reported on the February C4 for the 2021 campaign as it was still the month of February which we were reporting for 2021.

All in all, I had an oversight when reporting the carry forward amount, forgetting about the refund we needed to process for Delta Dental and reporting the amount in the bank account on our initial 2023 filing. I have reconciled both of these problems by revising the amount on the initial C4 to the correct \$0.00 and reported all carry forward as individual contributions to the 2023 campaign on a C-3 from today, 6/7, so they are all centrally located. Also, I have added the \$12 domain expense to the initial C-4 that was unreported by the campaign. I connected again with Delta Dental to ensure they cash a refund check that has been delivered. I created a separate bank account that now holds the surplus funds that were not approved to be transferred (\$1,746.89). Documentation is provided to support these numbers.

2. Ben Stukcart's employment information was from an exported list from ActBlue where he did not include his employer information. I bulk upload a lot of donations at once and do not individually

inspect the employment information that they provided. I have amended the C-3 (6/5/23) to reflect his employment, but there was no effort to ever "conceal" that information. It simply wasn't provided in his information he gave the campaign when he donated and therefore not a part of the upload to ORCA.

3. I understand that the complainant provided the most recent report from the Carl Maxey Center to the state. However, it is still out-dated as Councilmember Wilkerson resigned her position on the board in March 2023.

4. For the in-kind donation from Sterling Strategies- this is something I did not understand. I thought we could accept in-kind donations up to \$2,400 before the primary. We are happy to pay the \$279 to Sterling Strategies. However, they provided me with the attached guidance that says their tester list does not need to be reported because of their commercial discount policy that is attached here. Can you please provide more guidance on how I should address this situation? They claim the rules are the same as the FEC, but I have no idea.

4. In regard to the reports from last year, we are happy to clean up anything that needs to be with the descriptions or reclassifying any of the donations. Unfortunately, I do not have access to the 2021 campaign as there was a different treasurer at the time, Andy Taylor. Unfortunately, Andy is out of the country until 6/18, but can make updates upon his return. Any guidance for his work when he returns would be appreciated.

Please let me know if there is anything else that I need to address or you have clarifying questions and I would be happy to address that.

Thanks,

Riley Smith  
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