

[Grays Harbor Democrats](#) replied (Mon, 25 Nov 2024 at 2:30 PM)

To: "PDC Support" [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

External Email

Dear Ms. Blacksmith, Mr. Edwards and all other interested parties,

I have reviewed the most recent complaint appended to our open case 141468. I appreciate what Mr. Edwards is trying to accomplish, as I do see areas where PDC training, communication etc. could be improved. However, much like the committee I volunteer with, the PDC is a small organization and inundating them with complaints is not only taking away from their ability to make changes to the issues brought forth, but also prevents them from resolving cases, and answering questions in a timely manner. The latter of which has hindered my ability to resolve one of the issues brought up in this most recent complaint. Below, I have addressed as best I can the alleged violations. I am happy to provide any other information needed pending a return phone call or email by Filer Assistance. Though stressful to resolve at times, I welcome the opportunity to learn and improve our organization's reporting. I feel it important to note that this is the time of year where many county political committees elect new officers. Grays Harbor Democrats will be holding our reorganization soon and it is likely that a new treasurer will be put in place. I would hope that Mr. Edwards and anyone else observing committee filings would extend grace toward all incoming treasurers, as I am quite sure none set out to intentionally violate reporting rules. I know I certainly do not. I am simply a victim of human error. Again, please see below for explanations on this most recent complaint and thank you for your continued patience.

It appears the committee participated in the 2024 General Election by virtue of making a \$250 contribution to candidate Blake dated 9/7/24, a \$250 contribution to candidate Thomas on 9/12/24, and a \$5,650 expenditure to Alpha Media LLC for ads supporting candidates Blake, Thomas, Bernbaum, Tharinger, Chapman, Day, Carlson, and Coverdale. When a committee participates in an election, it is required to shift from monthly reporting to filing reports based on the election cycle (see attached Key Reporting Dates).

Based on its election participation, it appears Grays Harbor Democrats should have filed a 21-day pre-General C-4 report (covering 9/1 - 10/14) by 10/15/24 and a 7-day pre-General C-4 report (covering 10/15 - 10/28) by 10/29/24. However, the committee filed a monthly report for October on 11/11/24, which resulted in the expenditure to Alpha Media LLC not being reported until after the Nov. 5th General Election. Also, [additional expenditure description details must be included when disclosing political advertising on C-4 reports \(see also WAC 390-16-037\)](#).

This is correct. We did participate in the 2024 General election by way of contributions to Chris Thomas and Brian Blake as well as radio/streaming advertisements. I apologize for not complying with the 21-day pre-General C-4 reporting and 7 day pre-General C-4. It was an honest mistake based on my inability to clearly understand the reporting platform. I am hopeful that taking another round of training will remedy this in the future, should I continue to sit at treasurer for the Grays Harbor Democrats.

### Action Needed

Please amend the description details for the 10/4/24 expenditure made to Alpha Media on the committee's October 2024 C-4 report to include (add) the following information by **Monday, November 25, 2024**:

- The name & address of each sub-vendor used by Alpha Media LLC, a description of the work performed by that sub-vendor, and the portion of the \$5,650 expenditure paid to that sub-vendor; and
- The date(s) ad(s) were purchased from each sub-vendor by Alpha Media, and the broadcast or run dates for each ad.

If you do not have the above information, you may need to contact Alpha Media directly to obtain these details.

The character limit for the Purpose/Description field in ORCA has been expanded in recent years but the length of this description may prevent you from entering all of the above information in a single row. As a result, you may need to break up this expenditure by entering portions of it on separate rows based on some criteria, such as the candidate supported or the sub-vendor used. If you don't separate expenditures by candidate, it would be helpful to associate the media outlet used (e.g. radio, internet) and the ad's broadcast or run dates with the name of the candidate supported as this makes the information more useful to the public.

I have made requested changes as best I could without having received a return email or phone call from Filer Assistance to answer a few questions. I have submitted an amended C-4 report to reflect these changes. Regarding sub-vendors; I don't believe there to be any. I have reached out to Alpha Media Grays Harbor for clarification and will submit any pertinent information as soon as I receive it. I have also broken down the expenditure into three sections hoping to make the information clearer to understand. As for the broadcast or run dates for each ad, I need clarification from Filer Assistance as to whether or not the nearly 53 thousand streaming hits purchased need to be individually documented in the reporting. I'm not sure that's something Alpha Media has the ability to pull for me and I will also need instruction on the best way to get all of that data entered into the reporting system.

Please let me know at your earliest convenience if there is anything else I can do to aid you in closing this case.

Sincerely,

Bethany Whipple-Boling  
Grays Harbor Democrats