

Lake Washington Citizens Levy Committee

Trevor Willett, Chair

lakewalevy19@gmail.com

Public Disclosure Commission

Tanya Mercier, Compliance Officer

pdc@pdc.wa.gov

Dear Tanya Mercier,

This letter is to respond to the complaint filed against the Lake Washington Citizens Levy Committee on August 24, 2023 (PDC case number 141700). We are eager to cooperate to our fullest ability and work with you to resolve this matter.

Per your instructions, we will limit our reply to the following two areas:

1. Allegations of late reporting for reports, other than amendments, as outlined in the complaint.
2. Allegations for violation of WAC 390-16-037 specific to the reports outlined in the complaint.

Allegations of late reporting for reports

Reports filed by the Committee were indeed late, this was a particular issue in 2019. However, of the 29 reports which the Complaint highlights as late, 2 are amendments to previous reports and we have identified 10 additional reports which we believe were filed on-time (*see Appendix A*).

We regret the delays and can say that as a 100% volunteer-led organization, we had a volunteer Treasurer managing our PDC filings at the time. This individual had to take medical leave with health concerns and was not able to complete the filings.

The Committee proactively took action to address these issues, hiring a professional Treasurer (Philip Lloyd, Seattle CFO LLC), and we believe our filings today are current, accurate, and compliant.

- The Committee last participated in elections on February 8, 2022, and April 23, 2019.

Allegations for violation of WAC 390-16-037

On the six accused violations outlined on page 2 in the Complaint, we defer to the PDC's expertise on whether the level of detail included was sufficient to meet the standards required at the time those reports were filed. As our volunteer-led Committee has seen transitions to both Chair and Treasurer, amending reports in years prior to 2022 would be a hardship, as those records would be quite difficult to assemble with the materials available on-hand (e.g., the quantities of mail pieces). The Committee now has the infrastructure in place to ensure detailed disclosure of activities are filed in a timely manner moving forward, but there may be limited value to the public in amending reports to include additional details for a campaign that was two elections ago.

We are committed to following all PDC rules and have already allocated financial resources to address past issues and are committed to employing a professional Treasurer moving forward. Please let us know if any additional information would be helpful to complete your work.

Sincerely,

Trevor Willett

Chair, Lake Washington Citizens Levy Committee

Appendix A: Reports (10) inaccurately listed as late in the Complaint.

Report #	Type	Date Submitted	LWCLC Notes:
100893002	C4	3/9/2019	Not late - under \$200 reporting threshold
100893003	C4	3/9/2019	Not late - under \$200 reporting threshold
100925235	C4	8/19/2019	Not late - under \$200 reporting threshold
110064254	C4	12/7/2021	Not late - under \$200 reporting threshold
110070688	C4	1/18/2022	Not late - Feb 2022 pre-election report 12/1-1/17 due 1/18
110085394	C4	5/10/2022	Not late - no activity in March did not reach \$200 filing threshold until April 2022
110141321	C4	4/7/2023	Not late - no activity until March 2023 on combined month report
110147234	C4	5/16/2023	Not late - activity reported in earlier report
110147233	C3	5/16/2023	Not late - under \$750 reporting threshold
110147235	C4	5/16/2023	Not late - under \$750 reporting threshold