

Snohomish County Democratic Central Committee
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September 11, 2023

Public Disclosure Commission
711 Capitol Way Rm. 206
PO Box 40908
Olympia, Washington 98504-0908
(360) 753-1111

Re: Response to Complaint by Glen Morgan Against Snohomish County Democrats

Dear Compliance Officers:

We are writing in response to the complaint filed by Glen Morgan against the Snohomish County Democrats, as received on August 31, 2023. We appreciate the opportunity to address the allegations made in the complaint and provide our perspective on the matter.

First and foremost, we take campaign finance laws seriously and are committed to full compliance with Washington State's campaign finance regulations (RCW 42.17A). We understand the importance of transparency in political activities and the need to maintain public trust.

Late Reporting Allegations:

The complaint primarily focuses on the allegation that the Snohomish County Democrats have consistently filed late reports. This, of course, is true. We acknowledge that there have been instances of late reporting in the past, as mentioned in Mr. Morgan's complaint. We understand that these late reports can create skepticism and erode public confidence. The complaint further asserts that doing so represents a deliberate attempt to conceal political activity from the public. This couldn't be further from the truth. In fact, none of our reporting failures represent what the law refers to as "major violations, intentional violations, and [or] violations that could change the outcome of an election or materially affect the public interest."

While the complaint is probably correct that our committee might reasonably be considered "Large", we are certainly in no way reasonably considered "well-funded". This committee is entirely volunteer run with routine officer turnover and no budget for hiring external compliance professionals.

We would like to emphasize that while we have faced challenges in the past, we have taken significant steps to improve our reporting practices. We have implemented stricter internal deadlines, increased oversight, and improved communication to ensure timely and accurate reporting in the future. We take this matter seriously and are committed to rectifying any past discrepancies.

Failure to List Vendor Information for In-Kind Contributions:

The complaint also alleges that we have failed to list vendor information for certain in-kind contributions.

This component of the complaint is a bit confusing. The in-kind contributions we can see itemized in one set of reporting either seem reasonably responsive or represent *de minimis* contributions. We would appreciate your guidance as to which in-kind contributions you feel to be unresponsive to the reporting requirements. While it may be infeasible to recover the particulars of some of the past reported in-kind contribution vendor information, it is our intention to fully comply with reporting requirements, including providing the necessary vendor information.

To address this issue, we will promptly review all relevant reports and amend them as needed to include the required vendor details. Additionally, we will ensure that our team is properly trained to avoid such omissions in the future.

Impact on the Public:

We understand the importance of maintaining public trust, especially in the realm of campaign finance. Large political committees like ours should set an example for adherence to the law, and we are committed to doing just that. Our goal is to provide the public with accurate and timely information regarding our activities, as they have a right to know.

In conclusion, we are committed to addressing the concerns raised by Mr. Morgan. We believe in transparency and accountability and are taking proactive steps to ensure compliance with campaign finance laws. We appreciate the opportunity to rectify any past shortcomings and reaffirm our commitment to the highest standards of legal and ethical conduct.

Please do not hesitate to reach out if you require any further information or clarification regarding our response. We look forward to resolving this matter cooperatively and transparently.

Sincerely,



Monica Chilton
Chair
Snohomish County Democrats



Eric Valpey
Treasurer
Snohomish County Democrats