

Rebecca Kaldor

replied

Wed, 20 Sep 2023 at 10:53 AM

To: "PDC Support" <pdcc@pdc.wa.gov>

Mr. Young,

Thank you for your email. We understand that Mr. Morgan's complaint filed August 25, 2023 states that the Campaign for Tribal Self Reliance PAC Sponsored by the Washington Indian Gaming Association PAC violated RCW 42.17A.235 and .240 by failing to timely file C-3 and C-4 reports disclosing contribution and expenditure activities. I want to assure you that I have reviewed our reports and believe Mr. Morgan's complaint is overstated.

The complaint asserts 56 "late" reports were filed from 2018-2022. As you can see from a review of the reports, a majority of them—including most of them coded "red" on his spreadsheet—were not, in fact, late. Rather, (1) the activity was below the reporting threshold or (2) they were reports that amended a prior report, which by definition, are not "late." My understanding is that an amended report should be filed, no matter when an issue is discovered.

Many of the amended reports created a cascade effect. As your staff may recall from my prior telephone calls, we discovered that we had a minor discrepancy between our bank balance and our reports. I took this discrepancy seriously and hired an outside firm to help me locate it and prepare amended reports to address it. Several of the reports in the complaint reflect that, as demonstrated by them being filed on the same day(s). In an effort at transparency, we updated all the reports affected. Most of our amended reports show a minimal change to the dollar amount(s) involved.

Reviewing the remaining reports, there are some that were indeed late, some just a handful of days and some somewhat longer. I want to assure you that we will do better in the future and will institute processes to improve our timeliness. I have taken the PDC training courses and will be sure to continue to do so, as well as have other staff attend. I also will continue to engage with our outside firm on best practices for filing. I will say though that in reviewing our records, some of our late filings were only a handful of days late. Of the others that were later than that, many reflect transactions only from our sponsor organization, the Washington Indian Gaming Association (WIGA), whose name is right in our PAC name. No one would be surprised by that, nor would the public be damaged by a hidden donor. In another case, our report simply shows money being refunded to WIGA. Again, there is nothing in our filings that shows any attempt to hide our donors, go over campaign limits, or otherwise obfuscate our activities.

Again, I apologize for the instances of late reporting and can assure you that we will improve. But, many of the allegations in the complaint are simply untrue. Our amended filings reflect not an effort to “conceal the truth,” but quite the opposite: they show our organization’s commitment to accurate reporting and efforts to amend reports where we find a discrepancy, no matter how seemingly insignificant.

Thank you for your attention to this matter. Please do not hesitate to contact me for any further information about any specific report.

Rebecca George, Manager
Campaign for Self Reliance
360.352.3248