Dale Nachreiner, Treasurer
Clallam County Democrats
P. O. Box 2454
Port Angeles, WA 98362

November 19, 2022

Public Disclosure Commission
711 Capitol Way S Ste 206
Olympia, WA 98501
RE: 142043 Clallam County Democrats Complaint

Dear PDC Compliance Officer,

In preparation for the following narrative regarding the spreadsheet attached to the PDC email of 9.14.2023, and the late submissions since 2020, I noticed when researching each case, that the complainant misrepresented most of the late submitted complaints listed below. First, the complainant, when listing the number of days of the late submission, used the amended submission date, not the original submission date when listing the days late. Second, several times, the complainant listed the date of a holiday as the due date, when it is PDC policy to move that date to the next business day. Over one-half of the alleged late submissions were not late. One almost feels that the complaint was as much harassment as protecting the public right to know where money in politics comes from and is going.

Alleged Complaints listed on the spreadsheet attached to the PDC email of 9.14.2023

Eight (8) alleged C3 and C4 submissions late.

1. Two (1 C3 and 1 C4) orginal submissions were completed on the PDC due date. The complaint used the amended submission dates. Both reports were submitted on time. The C4 orginal submission (100921881) was amended due to missing a $5.65 expenditure. The C3 orginal submission (100938351) was amended on the next day but both reports were filed with the same information.
2. One C3 (100928219) was submitted on 9/4/2019. The complaint listed it due on a holiday. PDC lists the next business day following, 9/3/2019.   The report was still 1 day late, an oversight.
3. One C-4 (100921986) was submitted late, 4 days.   The account had no contributions or expenditures during the period. Zero balance.
4. The remaining four submissions were either 1 or 2 days late. An oversight, and no excuse.

The Clallam County Democrats treasurer during 2019 stated, "I do not remember why these were filed late. I was traveling a lot between California and Washington this summer and fall visiting my ill mother. I may have missed due dates due to traveling."

In addition to the 8 alleged late submission listed above, there were 24 other alleged late submission listed in 2018-2019 that the complainant used the amended date and not the original submitted date to show the submission was late. And three using Labor Day as the due date.

2020 Alleged Complaints

Three (3) alleged C4 late submissions in 2020

1. One complaint, the orginal submission, was completed on the due date. The complainant used the amended submission date.
2. On two of the complaints, the treasurer missed the 7-day pre-election C4 report deadline. It was submitted 6 days late. This was an oversight.

2021-2023 Alleged Complaints

Twenty (20) alleged C3 or C4 late submissions listed in complaint.

1. Seven C3s of the complaints were listed as due on a holiday (July 4 or Labor Day). PDC lists the next day following the holiday as the due date. All seven were submitted on the PDC due date.
2. Six (3 C3s and 3 C4s) orginal submission were completed on the due date. The complaint used amended submission date, when showing the number of days late.
3. Four (4) C4s listed in the complaint for the special submission dates 21- or 7-days before the primary. During my tenue, Clallam County Democrats did not participate in primaries. As such we submit monthly C-4s by the 10th of next month. All four were submitted on time.
4. One C3 was deposited <u>directly from</u> <u>PayPal,</u> and not discovered until bank reconciliation in August 2022, and the C3 was submitted late. This was an oversight.
5. One C4 was not submitted by the 21-day pre-general election date. It was an oversight. There were no contributions or expenditures activity in this account for the past few months. Zero balance.
6. One C3 (110131396) was submitted incorrectly. A check was issued to a vendor for a security deposit that would be returned if there was no damage to a rented space for a fundraiser. The expenditures were recorded and noted as a security deposit and rental space and listed in an earlier C4. Months later, after the event, the security deposit check was returned. The C3 was done when the check was returned. I believe now that I should have deleted or amended the expenditure to zero balance and amended the earlier C4.

If I may, most committee treasurers are volunteers and wish to report accurately and timely. However, as humans, we all do make mistakes.

I would like to share some processes developed to improve the accuracy of our contributions, expenditures, and PDC submissions.

1. About seventy-five (75) percent of our contributions have been directly deposited into our bank accounts from ActBlue or PayPal in the past three years. We check our bank accounts more than once during the week. We do, at least, a weekly deposit of any other contributions received in the mail or in person.
2. Clallam County Democrats do not normally contribute to candidates or campaigns during the primary; thus, we have registered for general election only. We submit monthly C4s except for the special 21- and 7-day special general election reporting periods.
3. Since 2022 when I noted that I missed both a contribution (direct deposit from ActBlue or PayPal) and expenditure after submitting a report, now I only complete C4s after I complete the bank account reconciliation to ensure accuracy.

In closing, as Treasurer and on behalf of the Clallam County Democratic Central Committee, we support the goals of the Public Disclosure Commission and the reporting requirements ensuring that the laws and regulations of Washington State are complied with. We believe that it strengthens our democracy.

I certify that this submission is true and based on our review of our Clallam County Democrats records and the best recollection of the treasurers of this period.

Respectfully submitted,

Dale Nachreiner

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Treasurer