

Kurt Young
Compliance Officer
Public Disclosure Commission
pdcc@pdcc.wa.gov

Mr. Young,

I would first like to clarify the complainant's statement that by announcing her candidacy for Congress, my client, Jacquelin Maycumber, ended her campaign for re-election to the State House in District 7. She did not end her State House campaign. She kept it open because things change all the time in politics. Until filing week came and went, she wanted to have her options available.

Complaint Allegation #1:

1. Illegal passing money through WSRP: My client has made numerous contributions from her surplus account to various Republican political organizations throughout the years. In fact, she has donated over \$250,000 to Republican organizations. She has never directed where that money was to go or how it was to be spent. In the case of the WSRP donation, she did not tell the WSRP to "earmark" that money or give instructions in any way on how the WSRP was to use that money. She knew the WSRP uses donations to help elect Republicans and she wanted to support that cause.

Jacquelin has no influence over the WSRP, but she is grateful that they were willing to donate to her congressional campaign. It is my understanding that the account that the WSRP used to donate to her federal campaign is a completely separate fund from what they use for State campaigns.

2. Timely Reporting: The Transfer of the \$5,500 to the WSRP should have been recorded on the April 8, 2024, C4 report. When filing the May 10 report, the treasurer realized that the March payment hadn't been reported on the April C4 and immediately filed an amended C4 report.

Complaint Allegation #2:

1. Failure to report Campaign Debt: Again, the Complainant claims that my client ended her State Representative campaign in February 2024. As I stated at the beginning of this letter, she did not end her state campaign until May, once she officially filed for the congressional campaign with the Secretary of State, and not for her state legislative position. In early April she talked to me about being responsible for running her State Campaign and if necessary, closing out the campaign should she decide not to file for the State Representative office again. She knew that she needed to focus all her energy on starting up a Congressional Campaign and did not want to have to deal with the State Campaign. I agreed and immediately submitted an invoice to the campaign. The campaign immediately paid the invoice, so there was no debt to report on the C4.
2. Using contributions from my state committee, for my federal campaign: I have no idea what the complainant is talking about here. He doesn't back up this allegation with any information.

Complaint Allegation #3:

1. I bought campaign supplies for my Congressional campaign with State Campaign Money: My client has not used any state campaign supplies for her federal campaign. The website bill was automatically withdrawn from her State Campaign account, for her state campaign. Once she announced her campaign for congress, she stopped the website billing to her State Campaign account.

Complaint Allegation #4:

1. Failed to accurately report my State F1 Report: When my client was filling out her PDC F1 form, she included all the financial information that she knew about, and she believed was accurate. Her CPA had filed for an extension, and he did not finish her taxes until June. That is when she learned she had made money on the sale of some cows in 2023. My client realized she hadn't included that information on her State F1 form and immediately filed an amended F1.

PDC Staff Question #1:

As stated above, my client has made numerous contributions from her surplus account to various Republican political organizations throughout the years. I want to reiterate that she has never directed any of these organizations on where that money was to go or how it was to be spent as a condition of her donating that money. She has never earmarked any donated money.

PDC Staff Question #2:

Expenditure to The ROC Foundation. In March of this year, after the legislative session had ended, it became clear to my client that if she was going to be serious about a Congressional Campaign, she needed to focus all her attention on the Congressional Campaign. In the first part of April, my client talked to me to see if I would be willing to handle all her State Campaign issues. She didn't have time to deal with any of it. She didn't want to end her State Campaign until filing week in May, just in case she changed her mind about running for congress.

I agreed that I would handle all of her State Campaign activities and keep the campaign open at least until May. If she decided to end her State Campaign, I would do everything necessary to accomplish that. If she decided to continue with her State Campaign, we would talk about how I would help her with that campaign. I submitted an invoice a few days later to the campaign and the campaign immediately paid me. Therefore, there was no requirement for the campaign to file a notice of debt since the invoice was immediately paid.

In March, my client knew that ending her state campaign (if that was what she was going to do) was going to be a lot of work. She worked hard last year to raise a lot of money and that money was going to have to be dealt with. She knew there are a number of rules that the PDC has in place for the disposal of the campaign and surplus money when someone ends a campaign early. She did not want to deal with that or any other issues that might come up (like her congressional opponent having someone file a PDC complaint against her). That is why she hired me.

PDC Staff Question #3:

State Campaign Expenditures: The expense to Zenfolio.com was for my client's official state campaign photo. Every two years she has gotten an updated professional photo taken for her campaign. In January of 2024, she started making plans to get her photo updated for her state campaign. The photos were taken when she was still planning on running for her state legislative position. The bill came due and was paid prior to her announcing her run for congress in late February.

The two expenses paid to Costco were for an IPAD, total \$930.73 and for accessories (keyboard and pen) for the IPAD, \$454.40. My client has the receipts for the purchases if you would like to see them. As a member of the House Republican Caucus, my client also serves on the House Republican Organizational Committee (HROC). While in session this year, the only computer she had access to was her legislative computer and she cannot do political activity on it. So, she purchased the IPAD to do her HROC work on and then she figured she could also use it for her state campaign. She has not used the IPAD for any personal reason and in fact has only used the IPAD once. It is currently in it's box at her house.

These expenses were made for her state campaign. She has not used them for any personal use.

I hope this answers your concerns. If you have any other questions, please let me know.

Sincerely,

Mitch Short
The ROC Foundation

DATE: April 11, 2024
INVOICE # JM24-01
FOR: Consulting Fee

Jacquelin Maycumber
Committee to Elect Jacquelin Maycumber

Make all checks payable to **The ROC Foundation**
If you have any questions concerning this invoice, contact Mitch Short, 509-994-7430, mitch@tewocf.com

THANK YOU FOR YOUR BUSINESS!