

Committee to Re-elect Bob Champion
5905 Chennault Beach Dr.
Mukilteo, WA 98275

8 November 2017

Mr. Tony Perkins
Investigator, Campaign Finance Unit
Washington Attorney General's Office
Desk 360.570.3402 | Mobile 360.485.3368 | Email tonyp@atg.wa.gov

Dear Mr. Perkins,

On 2 November 2017 you brought to my attention that Mr. Glen Morgan filed a citizen's action notice complaint under RCW 42.17A.765(4), alleging several campaign finance violations. You requested that I provide a written response. This letter will address each allegation individually.

Allegation One: Violation of RCW 42.17A.235 for failure to timely and accurately file C3 and C4 reports.

Response: The campaign has taken corrective action to insure that the treasurer files reports in a timely manner for all future reports.

Allegation Two: Violation of RCW 42.17A.555 for prohibited use of public resources for campaign purposes.

Response: Mr. Morgan alleges that the campaign used a photo from the City of Mukilteo as a campaign photograph for the purposes of political advertising. This photo was taken professionally prior to my time on the Mukilteo City Council and is my property – allowable for use in a political campaign.

Allegation Three: Violation of RCW 42.17A.235 for failure to properly break down expenses.

Response: Mr. Morgan alleges that the campaign has failed to report an in-kind contribution of professional services by Mr. Robert Knoll. This is meritless - Mr. Knoll is a campaign volunteer, no longer employed as a campaign professional since 2013 and is not seeking compensation in any form for hours provided. As such - his volunteer services are not debt to the campaign or in-kind professional services.

The campaign has taken corrective action for two items that were addressed in Mr. Morgan's complaint – the filing fee \$60 paid to the Snohomish County Auditor, as well as the \$25 domain registration for the website www.championformukilteo.com. The campaign has amended and re-filed the C-3 reports for the periods including these in-kind expenses.

Allegation four: Violation of RCW 42.17A.320 for failure to include committee address in Sponsor ID statement.

Response: The campaign has taken corrective action to include the committee address in the Sponsor ID Statement.

Allegation five (a): Violation of RCW 42.17A.465 for failure to record a loan by written instrument.

Response: The campaign has taken corrective action to report this loan by refilling the relevant C-3 with the PDC.

Allegation five (b): Violation of RCW 42.17A 240 for failure to identify lender's occupation, name, city, and state of employer.

Response: The campaign has taken corrective action and submitted amended reports to reflect lender's occupation, name, city and state of employer by refilling the relevant C-3.

Allegation Six: Violation of RCW 42.17A.700 for failure to accurately disclose ownership of a PERS retirement account.

Response: This allegation has no merit. Members of the Mukilteo City Council do not qualify for retirement benefits, and as such do not have related ownership of a PERS retirement account.

I look forward to working with the Attorney General's Office and the Public Disclosure Commission to insure accurate, timely and complete compliance with the laws governing campaign finance and am available at anytime to discuss this matter further.

Sincerely,

Robert A Champion