



October 30, 2017

Tony Perkins, Investigator
Office of the Attorney General
PO Box 40100
Olympia, WA 98504

Micaiah Titus Ragins, Compliance Coordinator
Public Disclosure Commission
711 Capitol Way #206
Olympia, WA 98504

RE: PDC Case #26322

Mr. Perkins and Mr. Ragins,

Attached, please find my responses to the allegations made by Glen Morgan against the Renata Rollins City Council Campaign.

Of the 15 claims made, 11 are false. These claims are about timely reporting and the disclosure of debt. I have responded to each of these allegations separately and by type in *Reference Exhibit A*, and *Reference Exhibit B*.

Four of the claims made are oversights that were made by me in my role as Treasurer for the campaign. These four inaccuracies appear in the same category and in the same fashion. Namely, the *amount* of items purchased was undisclosed four times. The *types* of items were correctly disclosed, and the *amount spent* by the campaign was also correctly disclosed. I have amended the reports relevant to these claims to reflect the number of items purchased, and I have responded to each claim separately in *Reference Exhibit C*.

This is my first time working in any capacity for a campaign. In my role as the Treasurer for the Renata Rollins City Council Campaign I have endeavored to be open and transparent about our financial activities. I have used my best understanding of the law to perform this job, and operated without any malice or intent to mislead the public about our financial activities.

Please accept my sincere appreciation for the work that is done by the PDC and AGO. Thank you for your time in considering my response.

Jordan Morris

A handwritten signature in blue ink, appearing to be "JM" with a large, stylized flourish.

Treasurer
Renata Rollins City Council Campaign



Reference Exhibit A

Allegation:

1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235) State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, Renata Rollins has failed on numerous occasions to do this. (See Exhibits A - "Illegally late reported C3 and C4 reports")

Allegations by Number with Responses:

#	Report #	Report Type	Amended?	Due Date	Day Reported
1	100781776	C4	Y	7/11/2017	8/10/2017

The C4 report due 7/11/2017 was reported on that date.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 06-01-2017 - 07-10-2017 was successfully transmitted on Tue Jul 11 20:12:41 PDT 2017 with confirmation # 100774663

Report 100781776 was an amendment to that report made on 8/10/2017.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 06-01-2017 - 07-10-2017 was successfully transmitted on Thu Aug 10 20:17:45 PDT 2017 with confirmation # 100781776

#	Report #	Report Type	Amended?	Due Date	Day Reported
2	100780409	C4	Y	7/11/2017	8/2/2017

The C4 report due 7/11/2017 was reported on that date.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 06-01-2017 - 07-10-2017 was successfully transmitted on Tue Jul 11 20:12:41 PDT 2017 with confirmation # 100774663

Report 100780409 was an amendment to that report made on 8/2/2017.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 06-01-2017 - 07-10-2017 was successfully transmitted on Wed Aug 02 18:12:21 PDT 2017 with confirmation # 100780409

#	Report #	Report Type	Amended?	Due Date	Day Reported
3	100781777	C4	Y	7/25/2017	8/10/2017

The C4 report due 7/25/2017 was reported on that date.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 07-11-2017 - 07-24-2017 was successfully transmitted on Tue Jul 25 19:41:45 PDT 2017 with confirmation # 100778620



Report 100781777 was an amendment to that report made on 8/10/2017.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 07-11-2017 - 07-24-2017 was successfully transmitted on Thu Aug 10 20:18:52 PDT 2017 with confirmation # 100781777

#	Report #	Report Type	Amended?	Due Date	Day Reported
4	100778616	C3	Y	7/10/2017	7/25/2017

The C3 report due 7/10/2017 was reported on that date.

ROLLINS RENATA (ROLLR 501): Your C3 for a deposit made on 07-10-2017 was successfully transmitted on Mon Jul 10 17:58:18 PDT 2017 with confirmation # 100773873

Report 100778616 was an amendment to that report made on 7/25/2017.

ROLLINS RENATA (ROLLR 501): Your C3 for a deposit made on 07-03-2017 was successfully transmitted on Tue Jul 25 19:36:39 PDT 2017 with confirmation # 100778616



Reference Exhibit B

Allegation:

2) Failure to accurately, timely report debt. (Violation of RCW 42.17A.240 (8), see WAC 390-05-295) State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days be reported on form C4. Per WAC 390-05-295, this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service. Renata Rollins illegally failed to report the following debts: (See Exhibit B - "Illegal failure to timely report debts").

Allegations by Number with Responses:

#	Vendor	Date	Amount	Description	Allegation
1	Olympia Copy & Printing	6/28/2017	269.28	Flyers	"This should have been reported as debt on the C4 covering the time period of May 2017."

The above referenced transaction that occurred on 6/28/2017, for the amount of 269.28, at Olympia Copy & Printing was a purchase. Prior to that purchase there was no debt, obligation, note, unpaid loan, oral or written order, or other liability incurred by the campaign that signaled intent to make this transaction, which remained outstanding for longer than 30 days which existed at the time of the C4 covering the time period of May, 2017.

#	Vendor	Date	Amount	Description	Allegation
2	Olympia Copy & Printing	7/5/2017	266.56	Flyers	"This should have been reported as debt on the C4 covering the time period of May 2017."

The above referenced transaction that occurred on 7/5/2017, for the amount of 266.56, at Olympia Copy & Printing was a purchase. Prior to that purchase there was no debt, obligation, note, unpaid loan, oral or written order, or other liability incurred by the campaign that signaled intent to make this transaction, which remained outstanding for longer than 30 days which existed at the time of the C4 covering the time period of May, 2017.

#	Vendor	Date	Amount	Description	Allegation
3	Bartlett, Colin	7/15/2017	400.00	Payment for Campaign Management Services	"This should have been reported as debt on the 21 day pre-primary C4."

The above referenced transaction that occurred on 7/15/2017, for the amount of 400.00, to Colin Bartlett was a payment for services rendered in his role as a month-to-month at-will employee. Prior to 7/15/2017 there was no debt, obligation, note, unpaid loan, oral or written order, or other liability incurred by the campaign that could have been reported to the PDC.



#	Vendor	Date	Amount	Description	Allegation
4	Olympia Copy & Printing	7/20/2017	383.52	3000 Flyers	"This should have been reported as debt on the 21 day pre-primary C4."

The above referenced transaction that occurred on 7/20/2017, for the amount of 383.52, at Olympia Copy & Printing was a purchase. Prior to that purchase there was no debt, obligation, note, unpaid loan, oral or written order, or other liability incurred by the campaign that signaled intent to make this transaction which existed at the time of the 21 day pre-primary C4.

#	Vendor	Date	Amount	Description	Allegation
5	Capitol City Press	6/8/2017	299.36	500 Remit Envelopes	"This should have been reported as debt on the C4 covering the time period of May 2017."

The above referenced transaction that occurred on 6/8/2017, for the amount of 299.36, at Capitol City Press was a purchase. Prior to that purchase there was no debt, obligation, note, unpaid loan, oral or written order, or other liability incurred by the campaign that signaled intent to make this transaction which existed at the time of the C4 covering the time period of May, 2017.

#	Vendor	Date	Amount	Description	Allegation
6	Capitol City Press	6/20/2017	1,238.74	Yard Signs	"This should have been reported as debt on the C4 covering the time period of May 2017."

The above referenced transaction that occurred on 6/20/2017, for the amount of 1,238.74, at Capitol City Press was a purchase. Prior to that purchase there was no debt, obligation, note, unpaid loan, oral or written order, or other liability incurred by the campaign that signaled intent to make this transaction which existed at the time of the C4 covering the time period of May, 2017.

#	Vendor	Date	Amount	Description	Allegation
7	Capitol City Press	8/8/2017	1,347.64	250 Yard Signs and 250 Metal Stakes	"This should have been reported as debt on the 7-day pre-primary C4."

The above referenced transaction that occurred on 8/8/2017, for the amount of 1,347.64, at Capitol City Press was a purchase. Prior to that purchase there was no debt, obligation, note, unpaid loan, oral or written order, or other liability incurred by the campaign that signaled intent to make this transaction which existed at the time of the 7-day pre-primary C4.



Reference Exhibit C

Allegation:

3) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037) State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with WAC 390-16-037 and WAC 390-16-205, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with WAC 390-16-037, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4. Renata Rollins illegally failed to break down the following expenses. (See Exhibit C - "Illegal failure to break down expenditures")

Allegations by Number with Responses:

#	Vendor	Date	Amount	Description	Report #	Allegation
1	Olympia Copy & Printing	6/28/2017	269.28	Flyers	100781776	"Failure to identify number of items printed."

The above referenced transaction that occurred on 6/28/2017, for the amount of 269.28, at Olympia Copy & Printing was incorrectly reported by the Campaign Treasurer. The quantity of "Flyers" was not disclosed to the PDC on Report # 100781776. This oversight was made without malice and without intent to deceive the public about the activities of the campaign.

To correct this error, and to ensure the public transparency of the activities of this campaign, an amendment with the quantity of "Flyers" was made on 10/31/2017.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 06-01-2017 - 07-10-2017 was successfully transmitted on Tue Oct 31 18:55:20 PDT 2017 with confirmation # 100797779

#	Vendor	Date	Amount	Description	Report #	Allegation
2	Olympia Copy & Printing	7/5/2017	266.56	Flyers	100781776	"Failure to identify number of items printed."

The above referenced transaction that occurred on 7/5/2017, for the amount of 266.56, at Olympia Copy & Printing was incorrectly reported by the Campaign Treasurer. The quantity of "Flyers" was not disclosed to the PDC on Report # 100781776. This oversight was made without malice and without intent to deceive the public about the activities of the campaign.

To correct this error, and to ensure the public transparency of the activities of this campaign, an amendment with the quantity of "Flyers" was made on 10/31/2017.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 06-01-2017 - 07-10-2017 was successfully transmitted on Tue Oct 31 18:55:20 PDT 2017 with confirmation # 100797779



#	Vendor	Date	Amount	Description	Report #	Allegation
3	Capitol City Press	6/20/2017	1,238.74	Yard Signs Metal Stakes	100781776	"Failure to identify number of items printed."

The above referenced transaction that occurred on 6/20/2017, for the amount of 1,238.74, at Capitol City Press was incorrectly reported by the Campaign Treasurer. The quantity of "Yard Signs" was not disclosed to the PDC on Report # 100781776. Additionally, the accompanying 150 Metal Stakes included in the price were left off of that disclosure. These oversights were made without malice and without intent to deceive the public about the activities of the campaign.

To correct this error, and to ensure the public transparency of the activities of this campaign, an amendment with the quantity of "Yard Signs", with the addition of "150 Metal Stakes", was made on 10/31/2017.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 06-01-2017 - 07-10-2017 was successfully transmitted on Tue Oct 31 18:55:20 PDT 2017 with confirmation # 100797779

#	Vendor	Date	Amount	Description	Report #	Allegation
4	FedEx Office Print & Ship Center	7/14/2017	14.50	10 Stickers	100781777	"Failure to identify number of items printed."

The above referenced transaction that occurred on 7/14/2017, for the amount of 14.50, at FedEx Office Print & Ship Center was incorrectly reported by the Campaign Treasurer. The quantity of "Stickers" was not disclosed to the PDC on Report # 100781777. This oversight was made without malice and without intent to deceive the public about the activities of the campaign.

To correct this error, and to ensure the public transparency of the activities of this campaign, an amendment with the quantity of "Stickers" was made on 10/31/2017.

RENATA ROLLINS (ROLLR 501): Your C4 for the period 07-11-2017 - 07-24-2017 was successfully transmitted on Tue Oct 31 18:55:55 PDT 2017 with confirmation # 100797780