

Yuan, Grace

replied (Sat, 9 Aug 2025 at 1:57 PM)

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

External Email

We are writing regarding PDC Case Number 176403. Thank you for taking action and combining the two case numbers. We acknowledge that there were delays in filing the May 2025, June 2025, and October 2024 reports. We have taken all necessary steps to ensure that future reports are filed in a timely manner.

First, the complaint references a May 2025 C-3 report that was due on June 10th but was filed on June 24th, and a June 2025 C-4 report that was due on July 15th but was filed on July 25th. We found an internal firm accounting error of \$47 that affected and delayed the filing of the May and June 2025 C-3 and C-4 reports. We were able to address the \$47 issue and subsequently file the reports accurately, even though the filings were not timely.” The PAC did not make any expenditures during the June pre-primary period.

Second, the complaint references an October 2024 pre-election C-4 report that was due on October 29th, 2024, but was submitted on November 6th, 2024. The committee did not make any expenditures during the seven-day pre-election period. Since reviewing the PDC letter, we have set new filing deadline procedures and will ensure that we file the pre-election report promptly going forward.

Third, the PDC letter refers to an October 2024 C-4 report with missing subvendor information. Per guidance from PDC staff, we have amended the report and have correctly coded three reimbursements. We have also amended the April 2025 C-4 report to code correctly a reimbursement expenditure.

If you have any questions, please call. Thank you.

Grace Yuan

Yuan, Grace

replied (Fri, 1 Aug 2025 at 1:55 PM)

To:"pdcc@pdcc.wa.gov" <pdcc@pdcc.wa.gov>

External Email

Ms. Townsend:

Thank you for speaking with me on July 31st.

The attached notice was sent to me and to Amalia.walton@klgates.com. Would it be possible to remove Amalia’s name from the PDC system and replace it with Lacey.stanage@klgates.com? If you have any questions, please call me at 206/370-7814. Thanks.

We are writing regarding PDC Case Number 176403. We acknowledge that there were delays in filing the May 2025, June 2025, and October 2024 reports. We have taken all necessary steps to ensure that future reports are filed in a timely manner.

First, the complaint references a May 2025 C-3 report that was due on June 10, 2025, but was filed on June 24, 2025. We found an accounting error of \$47 that affected and delayed the filing of the May and June 2025 C-3

reports. While the filings were not timely, we have addressed the \$47 issue and have made the information available to the public.

Second, the complaint references an October 2024 pre-election C-4 report that was due on October 29, 2024, but was submitted on November 6, 2024. The committee did not make any expenditures during the seven-day pre-election period. We now understand that a filing is required even when no contributions have been made during that time period. Since reviewing the PDC letter, we have set new filing deadline reminders and will ensure that we file promptly going forward.

Third, the PDC letter refers to an October 2024 C-4 report with missing subvendor information. Per guidance from PDC staff, we have amended the report and have correctly coded three reimbursements. We have also amended the April 2025 C-4 report to code correctly a reimbursement expenditure.

After the complaint was filed, the committee expended one reimbursement in July. The expense has been coded in accordance with the previous two reports mentioned above, and the committee has not expended any other reimbursements in 2025.

Yuan, Grace

reported via email (Mon, 8 Sep 2025 at 4:02 PM)
To:"PDC Support" <pdcc@pdcc.wa.gov>

External Email

Tabitha:

As a follow up, we reached out to Ladelle, a member of the Public Disclosure Commission reporting team, to amend all necessary reports with expenditures to sub vendors. We confirmed with Ladelle that when filing a reimbursement in ORCA, the address of the vendor being reimbursed does not show up on the report (even if it present internally on the software contact card), and the address of the vendor where items were bought will show up on the report.

Second, Ladelle asked us to discuss with you the two contribution refunds on report number [110303556](#) with the description "de-equitization."

K&L Gates has an equity partnership and an income partnership. Regularly, two of our equity partners have contributed to the PAC. However, they voluntarily changed their status to income partners and are no longer contributing to the PAC. The PAC decided to refund these partners for a portion of their contributions that were part of the March 21st deposit. (\$64.36 for Mark Roberts and \$54.20 for Mark Wittow).

Due to their change in status at the firm, we submitted the C4 report with the refunds and noted the reason description (de-equitization).

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If you have any questions, please call at 206-370-7814. Thank you!