

October 30, 2016

To: Washington State Public Disclosure Commission, Evelyn Fielding
Washington State Attorney General, Linda Dalton

From: Teresa Purcell, Candidate 19th Legislative District Pos. 1

RE: Response to PDC complaint filed by Glen Morgan

Thank you for the opportunity to respond to allegations made by Glen Morgan. Although I have worked on many campaigns, I have not been the person working on compliance on any of those campaigns. I have a volunteer treasurer and we have both done our best to understand and comply with the law.

I am responding to each item.

Item 1

As the domain registry for Purcell's campaign website will indicate (see attached), she appears to have begun her campaign for the State House on April 18th, 2016 (per RCW 42.17A.005(7)(a)). While this is the best proof we have of when the campaign started it is entirely possible that she became a candidate for the position before she purchased the domain. Purcell is required to file her F1 for with the PDC within two weeks of her candidacy. For her to have fulfilled this legal requirement, she would have had to file her F1 on or by May 2, 2016 for the time period of May 2, 2015 to May 2, 2016. Instead, she filed on May 6th, 2016 (4 days late) for the time period of May 6, 2015 to May 6, 2016 (which is legally incorrect time period). This is a violation of RCW 42.17A.700 (2). In order to bring herself into compliance with state law, Purcell must fill out, and submit to the PDC and amended F1 for the correct time period.

Response: I purchased the domain name prior to making the decision to run for office. My understanding of the law was that the F1 had to be filed with within two weeks of making an official announcement and spending resources or raising money for the campaign for which I feel I complied with the law.

Item 2

On her F1 form, Purcell has illegally identified 01-01-2017 as what would be the beginning of her term as Representative if she wins. Per RCW 42.12.030, if she won, she would take office immediately after the results are certified.

This is a violation of RCW 42.17A.700 (6).

Response: I am not an attorney. I was not aware of the obscure amendment to the Washington State Constitution that allows a representative-elect to assume office early in the rare occurrence that a legislative vacancy occurs between state certification of an election in a year that the office normally appears on the ballot and before the start of the next term. I will correct the pertinent PDC form.

Item 3

As evidenced by the whois registry for Purcell's campaign website "peopleforpurcell.com", Purcell purchased this domain on April 18th, 2016. While this was likely a personal "in-kind" contribution to her

own campaign, she failed to report this as such, and, in fact, has failed to report a single “in-kind” contribution to her own campaign, she failed to report this as such, and in fact, has failed to report a single “in-kind” contribution for her entire campaign.

This is a violation of RCW 42.17A.235.

Response:

This specific expense was a mistake on my part – but as it did not meet the threshold for itemized expenses it would have not been specifically identified as an in-kind expense.

Item 4

Purcell’s C-1 is listed as having been filed with the PDC on July 25, 2016. Per state law, the C-1 must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. Considering she received her first contribution on April 24, 2016 this would make her submission of the C-1 form nearly 3 months late. This is a violation of RCW 42.17A.205 (1).

Response:

Mr. Morgan did not look back to find the C-1 form that was originally and appropriately filed on April 29th. I updated my C-1 in July to reflect a change in my campaign. A staff person had to leave for personal reasons so I provided updated contact information.

Item 5

Purcell’s campaign lists an expenditure for \$8,000 to the vendor “Guenther Creative” for “film for Primary” that was made on 8/16. The Production for this video must have occurred before 7/25 because it was for the primary election. Therefore, it should have been reported as a debt on Purcell’s 7/26 C4. Which covered the time period of 7/12 to 7/25.

Unfortunately, she did not do so. This is a violation of RCW 42.17A.240 (8).

Response:

This was again a misunderstanding of the law on our campaign team’s behalf. Since we did not have an invoice for the work we did not report it on that C-4. It was not our understanding that we had to project debt for expenses that we did not have invoices for.

Items 6 - 158

Purcell’s campaign illegally failed to list the occupation and employer for over 152 separate donations, which is required for all contributions valued at \$100 or greater. Please see the list at the bottom of the complaint for details. This is a violation of RCW 42.17A.240(11).

Response:

Our campaign has gone back and looked at this and it is actually 36 entries and we have either identified the employer and occupation or requested the information from the donor. Tony Perkins clarified that

the legal requirement is for over \$100. We will work more diligently to gather that information in the future.

Below is the list of 36:

- 1) Peter Mason -- 5-9-16 \$1,000, 9-9-16 \$1,000 retired,
- 2) Laurel Murphy -- 5-13-16 \$500, 9-30-16 \$1,000 retired
- 3) Laura Quinn -- 5-13-16 \$1,000 President, Catalist
- 4) Patrick Kubin -- 7-6-16 \$500 Attorney
- 5) Ruth Lipscomb -- 4-26-16 \$500 retired
- 6) Edward Phillips -- 5-13-16 \$500 retired
- 7) Fred Ross -- 5-13-16 \$125, 7-11-16 \$500, 10-11-16 \$150 – IBEW Local 1245, CA
- 8) Kathleen Washienko, 7-26-16 \$500 requested
- 9) Nancy Roesch -- 6-21-16 \$200, 9-21-16 \$400 Retired
- 10) Tracy Cockrill -- 5-19-16 \$250, President, Newman Partners
- 11) Christina Koons -- 9-30-16 \$250 - Requested
- 12) Gail Harmon -- 4-28-16 \$200, 10-18-16 \$250 Attorney, Harmon, Curran, Spielberg + Eisenberg, LLP
- 13) Gian Paul Morelli --10-10-16 \$250 Director, Columbia Theater, Longview
- 14) Ann Mottet -- 6-21-16 \$200, 10-25-16 \$250 - Attorney
- 15) Thomas Novick -- 10-23-16 \$250, Principal M & R Strategic Services
- 16) Terri Shuck -- 10-23-16 \$250 Executive Director, National Public Education Support Fund
- 17) Gretchen Sorensen -- 9-9-16 \$250 – Principal The Sorenson Group
- 18) Elizabeth Sullivan -- 6-27-16 \$250, 10-18-16 \$250 Consultant
- 19) Beverly Arnold -- 6-28-16 \$100, 9-21-16 \$200 requested
- 20) Marcel Goulet -- 6-21-16 \$200 – Kalama Housing Authority
- 21) Larry Hoff -- 9-26-16 \$200 requested
- 22) Joan Melgaard 7-2-16 \$200 President, Etho Praxis
- 23) Sue Nickerson -- 7-19-16 \$200, 10-10-16 \$200 Retired
- 24) Paul Roesch --6-21-16 \$200 Attorney
- 25) Kathleen Sayce 6-13-16 \$200 requested
- 26) Robert Welland 5-19-16 \$200 requested

- 27) Catherine Allen -- 9-9-16 \$150 President, The Connections Group
- 28) Lynn Kessler --10-20-16 \$150 retired
- 29) Gregory Lopic -- 6-3-16 \$150 -- retired
- 30) Margaret Lopic -- 6-3-16 \$150 -- retired
- 31) Christina Mace -- 7-25-16 \$125.50 - requested
- 32) Margo Feinberg -- 5-13-16 \$125 – Attorney Schwartz, Steinsapier, Dohrman
- 33) Lonnie Brown -- 2 donations -- 4-30-16 \$100, 5-13-16 \$100 - Office of the Washington State Insurance Commissioner, Legislative Director
- 34) Michael Frey -- 6-21-16 \$100, 10-10-16 \$100 Attorney, Frey and Busby Longview, WA
- 35) Bill Arthur -- 2 donations , 4-29-16 \$100, 7-19-16 \$75 Retired
- 36) Michal Robinson -- 4-30-16 \$50, 5-27-16 \$50, 6-13-16 \$50 Retired