



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

June 7, 2019

Iranian American PAC
Attn: Morad Ghorban, Political Director
5335 Wisconsin Avenue, NW, Suite 440
Washington, DC 20015

Subject: Complaint filed regarding Iranian American PAC, PDC Case 20789

Attn: Mr. Ghorban:

I have attached a copy of a letter sent electronically to Glen Morgan concerning the complaint he filed with the Public Disclosure Commission (PDC) against the Iranian American PAC for contributions made to Cyrus Habib for Lt. Governor in Washington State in 2016. As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into the allegations or taking any action in this matter.

However, pursuant to WAC 390-37-060(1)(d) PDC staff is hereby formally warning Iranian American PAC concerning the importance of timely filing Out-of-State Committee Reports (C-5 report) as required for a political committee registered with the Federal Election Commission (FEC) in accordance with PDC laws, rules and reporting requirements. This formal written warning includes staff's expectation that the Iranian American PAC will timely C-5 reports in the future disclosing contributions made to Washington State candidates and political committee registered with the PDC. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
Peter Lavalley, Executive Director



Enclosures: Electronic complaint return letter addressed to Glen Morgan
Blank C-5 report form



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June 7, 2019

Sent electronically to Glen Morgan

Subject: Complaint filed against Iranian American PAC, PDC Case 20789

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2017. Your complaint alleged that the Iranian American PAC made two monetary contributions totaling \$3,900 to Cyrus Habib, a 2016 candidate for Lieutenant Governor in Washington State, but failed to file an Out-of-State Committee Report (C-5 report) as required in accordance with RCW 42.17A.250.

PDC staff reviewed the allegations listed in the complaint, the statutes, rules and reporting requirements, the PDC database for contributions received from the Iranian American PAC, and committee information for the Iranian American PAC on the Federal Election Commission (FEC) website. We noted that the complaint was also filed with the Washington State Attorney General's Office (AGO) as a Citizen Action Notice (CAN). Based on staff's review, we found the following:

- On December 10, 2015, the 2016 Cyrus Habib for Lieutenant Governor Campaign (Campaign) timely filed a Monetary Contributions report (C-3 report) with the PDC disclosing that the Campaign received a \$1,900 monetary contribution from the Iranian American PAC, and listing the address as 1350 Connecticut Ave NW, Washington, DC 20036, on November 9, 2015. The Campaign timely deposited the funds into the bank account on November 9, 2015, and properly attributed the contribution to the 2016 primary election contribution limits.
- On December 12, 2016, the Campaign timely filed a C-3 report with the PDC disclosing that the Campaign received a \$2,000 monetary contribution from the Iranian American PAC on November 11, 2016. The Campaign timely deposited the funds into the bank account on November 11, 2016, and properly attributed the contribution to the 2016 general election contribution limits.
- According to the Federal Election Commission (FEC) website and database, the Iranian American PAC is registered with the FEC and their address is listed as 5335 Wisconsin Avenue, NW, Suite 440, Washington, DC 20015. As a federal out-of-state political committee, the Iranian American PAC was required to file two C-5 reports with the PDC; one C-5 report was due no later than December 10, 2015, and the other C-5 report was due December 10, 2016, in accordance with RCW 42.17A.250.

- On July 13, 2017, PDC staff was informed the AGO would not be pursuing this matter, and staff attempted to contact the Iranian American PAC representative, at an email address found by staff, on several occasions, but no response was received by the PDC.
- The 2016 Cyrus Habib for Lieutenant Governor Campaign disclosed receiving \$1,104,730 in total monetary and in-kind contributions. The \$3,900 in monetary contributions received by the Campaign from the Iranian American PAC represented slightly more than .35 percent of total contributions received for the entire 2016 election cycle.

While the Iranian American PAC was required to disclose the \$3,900 contribution made to the Cyrus Habib Campaign in 2016 on two C-5 reports, based on this information, the PDC has determined that the facts do not warrant further investigation.

However, pursuant to WAC 390-37-060(1)(d) PDC staff is formally warning the Iranian American PAC concerning the importance of timely filing Out-of-State Committee Reports (C-5 report) as required for a political committee registered with the FEC, in accordance with PDC laws and rules. The formal written warning includes staff's expectation that the Iranian American PAC will timely file C-5 reports in the future disclosing all contributions made to Washington State candidates and political committees registered with the PDC. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
Peter Lavalley, Executive Director

cc: Iranian American PAC

