



**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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

May 23, 2019

Xerox Corporation PAC  
Attn: Michele L. Cahn  
1800 M Street NW, North Tower, Fifth Floor  
Washington, DC 20036.

Subject: Complaint filed regarding Xerox Corporation PAC, PDC Case 20780

Attn: Ms. Cahn:

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 Xerox Corporation PAC. 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 Xerox Corporation PAC concerning the importance of timely filing Out-of-State Committee Reports (C-5 reports) as required for a political committee registered with the Federal Election Commission (FEC) or in another state, in accordance with PDC laws, rules and reporting requirements. This formal written warning includes staff's expectation that Xerox Corporation 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@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Kurt Young, Compliance Officer

s/ \_\_\_\_\_  
Peter Lavalley, Executive Director



Enclosures: Complaint Return Letter to Glen Morgan  
Blank C-5 report



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May 23, 2019

Sent electronically to Glen Morgan

Subject: Complaint filed against Xerox Corporation, PDC Case 20780

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2017. Your complaint alleged that Xerox Corporation PAC made a \$1,000 contribution to Jay Inslee, the incumbent Governor of Washington State and a candidate for re-election to that office in 2016, but that Xerox Corporation PAC 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 contribution information for Xerox Corporation PAC, and Google searches for information related to Xerox Corporation PAC. We note 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 July 5, 2016, the 2016 Jay Inslee for Washington Campaign (Campaign) timely filed a Monetary Contributions report (C-3 report) with the PDC disclosing that the Campaign received a \$1,000 monetary contribution from Xerox Corporation PAC (Committee) on June 22, 2016. The Campaign timely deposited the funds into the bank account on June 28, 2016, and properly attributed the contribution to the 2016 primary election contribution limits.
- According to the Federal Election Commission (FEC) website and database, Xerox Corporation PAC is registered with the FEC and their reports disclosed the committee made a \$1,000 contribution to Jay Inslee for Washington on June 13, 2016. The address for the Committee is 1800 M Street NW, North Tower, Fifth Floor, Washington, DC 20036.
- As an out-of-state political committee, Xerox Corporation PAC was required to file a C-5 report no later than July 10, 2016, in accordance with RCW 42.17A.250.
- PDC staff received a copy of a July 10, 2017, letter from Tonya Donalty, with Xerox Corporation PAC, addressed to Tony Perkins, of the AGO's Campaign Finance Unit (AGO CFU), responding to the CAN complaint.

- Once PDC staff was informed the AGO would not be pursuing this matter, staff attempted to contact Ms. Donalty at an email address found by staff on several occasions but no response was received by the PDC.
- The 2016 Jay Inslee for Governor Campaign disclosed receiving \$9,949,579 in total monetary and in-kind contributions. The \$1,000 contribution received by the Campaign from Xerox Corporation PAC represented less than .01 percent of total contributions received for the entire 2016 election cycle.

While Xerox Corporation PAC was required to disclose the \$1,000 contribution made to the Jay Inslee Campaign in 2016 on a C-5 report, based on this information, the PDC has determined that the facts do warrant further investigation.

However, pursuant to WAC 390-37-060(1)(d) PDC staff is formally warning Xerox Corporation PAC concerning the importance of timely filing Out-of-State Committee Reports (C-5 reports) as required for a political committee registered with the Federal Election Commission (FEC) or in another state, in accordance with PDC laws and rules. The formal written warning includes staff's expectation that Xerox Corporation PAC will timely 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](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Kurt Young, Compliance Officer

s/ \_\_\_\_\_  
Peter Lavalley, Executive Director

cc: Xerox Corporation PAC

