



**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

August 27, 2019

Sent electronically to office@whatcomdemocrats.org and ewan@workerlaw.com

Subject: Complaints filed by Glen Morgan, PDC Case 54841

Dear Whatcom County Democratic Central Committee and Laura Ewan:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) alleging the Whatcom County Democratic Central Committee violated RCW 42.17A.220 for accepting and retaining over-limit anonymous contributions during the 2018 calendar year.

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Barbara Sandahl
Deputy Director
for Peter Lavalley
Executive Director



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August 27, 2019

Sent Electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Whatcom County Democratic Central Committee, PDC Case 54841

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed July 17, 2019. Your complaint alleged the Whatcom County Democratic Central Committee, may have violated RCW 42.17A.220(4) for accepting over limit anonymous contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Laura Ewan, Attorney for the Whatcom County Democratic Central Committee; the applicable PDC reports filed by the Committee; data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- RCW 42.17A.220(4) states in part that “accumulated unidentified contributions ..., in excess of one percent of the total accumulated contributions received in the current calendar year, or three hundred dollars, whichever is more, may not be deposited, used, or expended, but shall be returned to the donor if his or her identity can be ascertained. If the donor cannot be ascertained, the contribution shall escheat to the state and shall be paid to the state treasurer for deposit in the state general fund.”
- On its website, PDC guidance outlines the amount of anonymous contributions a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2018, Whatcom County Democratic Central Committee accepted anonymous contributions in the amount of \$424, which was \$124 more than the allowable limit of \$300.
- Staff’s review of the Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by Whatcom County Democratic Central Committee found the committee could accept the greater amount of up to 1 percent of the total accumulated contributions.

- In the response, Ewan stated “The Committee did not surpass the \$300 threshold for anonymous contributions until September 25, 2018, by which time the Committee’s contributions totaled \$119,074.92—see Report 100878603—one percent of which would have been \$1,190.75. By the end of calendar year 2018, the Committee reported \$149,628.20 in contributions. \$424.00 is well short of one percent of \$149,628.20. Furthermore, none of the contributions exceeded \$25 from a single anonymous source. They came from multiple anonymous individuals making small contributions—thus still clearly within the parameters of RCW 42.17A.220(4).”

Based on these findings, staff has determined that, in this instance, no evidence supports a finding of a violation warranting further investigation.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s_____

Alice Fiman
Compliance Officer

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