



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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August 23, 2019

Delivered electronically to Glen Morgan at [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding Kshama Sawant, PDC Case 54852

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 17, 2019. Your complaint alleged that Kshama Sawant, a candidate for City Council Member for the City of Seattle in 2019, 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 applicable PDC reports filed by the Respondent; and reviewed the Respondent's data in the PDC contribution database, to determine whether the record supports a finding of one or more violations.

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

- On January 11, 2019, Kshama Sawant timely filed a C-1 report declaring her candidacy for City Council Member for City of Seattle in 2019 and selected the Full Reporting Option.
- 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, the PDC guidance outlines the amount of anonymous contributions a candidate or a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2018, Kshama Sawant accepted anonymous contributions in the amount of \$408.54, which is \$108.54 more than the allowable limit of \$300.
- Staff review of the Monetary Contribution reports (C-3 reports) and the Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by Kshama Sawant found her campaign could accept the greater amount of up to 1% of the total accumulated contributions.
- In her response to the allegation, by way of her outreach coordinator, Emerson Johnson, Ms. Kshama stated... "It seems that the person who submitted this complaint misinterpreted the law around the limit of anonymous campaign donations we can take. The law says that campaigns can accept and retain anonymous contributions of 1% contributions received in the calendar year, or \$300, whichever is greater."

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

Sincerely,

Endorsed by,

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavalley, Executive Director

cc: Kshama Sawant

