

July 18, 2019

Washington State Public Disclosure Commission

Re: PDC Case Number 54855

Friends of Don Orange

Campaign for Port of Vancouver Commissioner - 2017

We dispute the July 17, 2019 complaint filed by Glen Morgan. The complaint states that the campaign illegally accepted anonymous donations of \$986 and insists that the amount is over the \$300 anonymous donations allowed by law.

Glen Morgan is ignoring the part of RCW 42.17A.240 (4) that allows anonymous donations to be the greater of \$300 or 1% of the total donations for the calendar year. The campaign took in \$427,712.31 in total donations. In 2017 this race had no limits on the amount someone could donate to the campaign. That law was changed in 2019 which put races for the Port of Vancouver under the same rules as other campaigns. One percent of contributions for this race was \$4,725. The anonymous donations reported by this campaign was \$986, well below the allowed amount.

Please see below:

**RCW 42.17A.240 (4)**

(4) Accumulated unidentified contributions, other than those made by persons whose names must be maintained on a separate and private list by a political committee's treasurer pursuant to RCW 42.17A.240(2), 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.

We request that the PDC dismiss this complaint as wrongly filed.

Linda McLain

Campaign Treasurer for Friends of Don Orange.

**SUMMARY, FULL REPORT  
RECEIPTS AND  
EXPENDITURES**

**C4**  
(1/12)

PDC OFFICE USE

Candidate or Committee Name (Do not abbreviate. Include full name)

DON ORANGE (Friends of Don Orange)

Mailing Address

1111 Main Street, Suite 400

City

Vancouver

Zip +4

98660

Office Sought (Candidates)

PORT COMMISSIONER

2017

Report Period  
Covered

From (last C-4)

To (end of period)

Final Report?

01/01/2018

01/31/2018

Yes ☒ No

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?

**RECEIPTS**

\*See next page

Yes

No

X

1. Previous total cash and in kind contributions (From line 8, last C-4)  
(if beginning a new campaign or calendar year, see instruction booklet) ..... \$427,712.31
2. Cash received (From line 2, Schedule A) ..... \$50.00
3. In kind contributions received (From line 1, Schedule B)..... \$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)..... \$50.00
5. Loan principal repayments made (From line 2, Schedule L)..... -\$218.14
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-) \$0.00
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-) -\$218.14
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) ..... \$427,544.17
9. Total pledge payments due (From line 2, Schedule B) ..... \$0.00

**EXPENDITURES**

10. Previous total cash and in kind expenditures (From line 17, last C-4)  
(if beginning a new campaign or calendar year, see instruction booklet) ..... \$427,532.24
11. Total cash expenditures (From line 4, Schedule A) ..... \$230.07
12. In kind expenditures (goods & services) (From line 1, Schedule B) ..... \$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)..... \$230.07
14. Loan principal repayments made (From line 2, Schedule L)..... -\$218.14
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-) \$0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-) -\$218.14
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)..... \$427,544.17

**CANDIDATES ONLY**

Name not

Won

Lost

Unopposed

on ballot

Primary election

☐☐☐☐

General election

☐☐☐☐

Treasurer's Daytime Telephone No.:

(360) 241-1222

**CASH SUMMARY**

18. Cash on hand (Line 8 minus line 17) ..... \$0.00  
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]
19. Liabilities: (Sum of loans and debts owed) ..... \$390.94
20. Balance (Surplus or deficit) (Line 18 minus line 19) ..... -\$390.94

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature

Date

Treasurer's Signature

Date

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

**A**  
(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

DON ORANGE (Friends of Don Orange)

Report Date

01/01/2018 01/31/2018

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
01/04/2018	\$50.00					\$
2. TOTAL CASH RECEIPTS						Enter also on line 2 of C4 \$ \$50.00

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveller and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

## 3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$11.93
01/08/2018	DON ORANGE 4721 NE 66th Ave #15 Vancouver WA 98661		LOAN REPAYMENT	\$218.14

Total from attached pages \$ \$0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ \$230.07

# LOANS

SCHEDULE  
TO C3  
OR C4

**L**

(12/99)

Page 1

Candidate or Committee Name

Report Date

DON ORANGE (Friends of Don Orange)

01/01/2018 01/31/2018

**2. LOAN PAYMENTS.** Candidates may be repaid no more than amount loaned or permitted by WAC 390-05-400, whichever is less. See instruction manual.

Date Paid	Lender's Name and Address	Principal Paid	Interest Paid	Total Payment	Balance Owed
01/08/2018	DON ORANGE 4721 NE 66th Ave #15 Vancouver WA 98661	\$218.14	\$0.00	\$218.14	\$390.94
Total Principal Paid This Page →		\$218.14			
			Total Payments This Page →	\$0.00	

## LOANS

**SCHEDULE  
TO C3  
OR C4**

(12/99)

Candidate or Committee Name

Report Date

DON ORANGE (Friends of Don Orange)

01/01/2018	01/31/2018

**4. LOANS STILL OWED.** List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount	Principal Repaid or Forgiven	Amount Owed
10/20/2017	DON ORANGE 4721 NE 66th Ave #15 Vancouver WA 98661	\$5,000.00	\$4,609.06	\$390.94
			Subtotal This Page	\$390.94