



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

August 23, 2019

Delivered electronically to Laura Ewan at "ewan@workerlaw.com"

Subject: Complaint filed by Glen Morgan, PDC Case 54863

Dear Ms. Ewan:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s

Jennifer Hansen
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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August 23, 2019

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding WA State Democratic Central Committee, PDC Case 54863

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 the Washington State Democratic Central Committee (WSDCC), a statewide bona fide committee, may have violated RCW 42.17A.220(4) for accepting over limit anonymous contributions during calendar year 2016.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Laura Ewan, an attorney with Schwerin, Campbell, Barnard, Iglitzin & Lavitt, LLP on behalf of WSDCC; the applicable PDC reports filed by Respondent; and queried the Respondent's 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:

- During calendar year 2016, WSDCC was registered as a statewide bona fide committee under 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, PDC guidance outlines the amount of anonymous contributions a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2016, WSDCC accepted anonymous contributions in the amount of \$2,617, which was \$2,317 more than the allowable limit of \$300.
- In her response, Ms. Ewan stated that the calculation used in the complaint is inappropriate and neglects the totality of WSDCC's contributions for the calendar year. In addition, Ms. Ewan stated that WSDCC did not surpass the \$300 threshold for anonymous contributions until April 4, 2016, by which time the committee's contributions totaled \$464,893.92, and that the disclosed amount of anonymous contributions were below the allowable 1 percent.
- Staff's review of the Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by WSDCC found the

committee could accept the greater amount of up to 1 percent of the total accumulated contributions.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Laura Ewan with Schwerin, Campbell, Barnard, Iglitzin & Lavitt, LLP