

Complaint Description

Glen Morgan (Wed, 17 Jul 2019 at 10:54 AM)

To whom it may concern,

It has come to my attention that the 37th Democratic Party Legislative District Committee during the 2016 campaign session violated Washington State's campaign finance laws (**RCW 42.17A**).

1) Accepting Illegal Over limit Anonymous Contributions (Violation of RCW 42.17A.220 (4))

This PAC violated Washington State's campaign finance laws by accepting more than \$300 in anonymous contributions from donors. Specifically, it appears that they accepted \$658.51 in anonymous contributions (apparently from one source), which is \$358.51 more than the allowable anonymous contribution limit defined in **RCW 42.17A.220 (4)**.

Upon reviewing the expenditures by this candidate's political committee, there is no evidence supporting any claim these funds were eschewed to the Treasury of the State of Washington as is required in law. Therefore this is a violation of the statute, and these funds should be immediately forfeited to the Washington State Treasury.

I have attached the relevant C3 report which provides the detail on the anonymous contributions received by this committee during the 2016 campaign. **This committee must forfeit \$358.51 to the Washington State Treasury immediately.** In this way, these funds can be squandered along with the rest of the general fund tax dollars, but at least this forfeiture of anonymous dark money funds may discourage others from attempting to hide their anonymous, secretive, dark money in this political campaign.

This committee should be warned about not taking secretive, dark money anonymously to fund political campaigns. This is a serious violation of Washington's State campaign finance laws and counter to the spirit and intention of transparency in the political process.

It should be noted for the record that this committee has been warned by the PDC in the past (See **PDC Enforcement Case # 26340** Formal Warning Letter attached for reference). The violation described above was not included in this past complaint and PDC investigation of this Political Committee.

Please feel free to contact me if you have any further questions on this matter.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to have political committees which do not fund their political campaigns by secretive, anonymous dark money funding as this committee chose to do. This political committee must forfeit these illegal dark money funds and send them to the Washington State Treasury where they can be squandered with the rest of the General Fund. At least it will send a message to future dark money anonymous donors that their money is not welcome, even in political committees like this one.

List of attached evidence or contact information where evidence may be found.

see attached

List of potential witnesses with contact information to reach them.

The past treasurer and political committee officers should be sufficient

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100687796

03-30-2016

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

37th Legislative District Democrats

Mailing Address

2518 S Brandon Ct

City

Seattle, WA

Zip + 4

98108

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
03/26/16	a. Anonymous	658.51	658.51
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
03/26/16	JEANNE LEGAULT 2518 S Brandon Ct Seattle, WA 98108		<input type="checkbox"/>	<input type="checkbox"/>	37.00	37.00
	Occupation					
03/26/16	CHRISTINA LEWIS 6801 S 133rd St #B319 Seattle, WA 98178		<input type="checkbox"/>	<input type="checkbox"/>	25.00	25.00
	Occupation					
03/26/16	LEMBHARD HOWELL 814 Lakeside Dr S Seattle, WA 98144		<input type="checkbox"/>	<input type="checkbox"/>	25.00	25.00
	Occupation					
03/26/16	REBECCA BURNS 10447 65th Ave S Seattle, WA 98178		<input type="checkbox"/>	<input type="checkbox"/>	25.00	25.00
	Occupation					
03/26/16	LEE COVELL 119 First Ave S #600 Seattle, WA 98104		<input type="checkbox"/>	<input type="checkbox"/>	25.00	25.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			795.51	*See reverse for details.
		Amount from attached pages			3,365.92	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4,161.43

4. Date of Deposit

03/30/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Jeanne E Legault

03-30-2016

Treasurer's Daytime Telephone No.: (206) 723-3045

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	JOSE LOPEZ 539 32nd Ave S Seattle, WA 98144	Occupation			20.00	20.00
03/26/16	JAMES SNELL 3450 E Alder St Seattle, WA 98122	Occupation			20.00	70.00
03/26/16	DIANE SNELL 3450 E Alder St Seattle, WA 98122	Occupation			20.00	70.00
03/26/16	FLORENCE RENCH 3420 E Huron St Seattle, WA 98122	Occupation			20.00	20.00
03/26/16	MARTHA WILHELM 6103 S Norfolk St Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	LYNN LAMBIE 6014 S Redwing St Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	VICTORIA CLARAVAL 9762 Waters Ave S Seattle, WA 98118	Occupation			20.00	45.00
03/26/16	MARIA CAPESTANY 3631 37th Ave S Seattle, WA 98144	Occupation			20.00	20.00
03/26/16	JOSEPH PETERSON 8403 Island Dr S Seattle, WA 98118	Occupation			25.00	25.00
03/26/16	THERESA DOHERTY 8403 Island Dr S Seattle, WA 98118	Occupation			25.00	25.00
03/26/16	MARIA MONROE-DEVITA 823 25th Ave S Seattle, WA 98144	Occupation			100.00	100.00

Page Total 290.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 3

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00			P R I	G E N	Amount	Aggregate Total*
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State				
03/26/16	ALAN KRISTAL 915 36th Ave Seattle, WA 98122	Occupation			40.00	40.00
03/26/16	SANDRA WELLANDER-MCCARTNEY 4526 46th Ave S Seattle, WA 98118	Occupation			50.00	50.00
03/26/16	BETTY ADAMS 6304 S Ryan St Seattle, WA 98178	Occupation			37.00	37.00
03/26/16	VICTORIA CLARAVAL 9762 Waters Ave S Seattle, WA 98118	Occupation			25.00	45.00
03/26/16	GEORGIA SPENCER 9845 60th Ave S Seattle, WA 98118	Occupation			37.00	37.00
03/26/16	MICHAEL ACORD 12721 76th Ave S Seattle, WA 98178	Occupation			37.00	37.00
03/26/16	MONIQUE MALSON 8405 S 118th St Seattle, WA 98178	Occupation			40.00	40.00
03/26/16	CHRISTINA MARRA 141 Euclid Ave Seattle, WA 98122	Occupation			32.50	32.50
03/26/16	PAUL SILVER 141 Euclid Ave Seattle, WA 98122	Occupation			32.50	32.50
03/26/16	JOHN SCHUITEMAKER 3501 E Terrace St Seattle, WA 98122	Occupation			50.00	50.00
03/26/16	KATHERINE JAMES-SCHUITEMAKER 3501 E Terrace St Seattle, WA 98122	Occupation			50.00	50.00

Page Total 431.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 4

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	KRISTEN WILD 10126 66th Ave S Seattle, WA 98178	Occupation			37.00	37.00
03/26/16	PEARL CAMPBELL 10760 Renton Ave S Seattle, WA 98178	Occupation			20.00	20.00
03/26/16	HAFOC YATES 308 Fourth Ave S #514 Seattle, WA 98104	Occupation			15.00	15.00
03/26/16	PHILLIP GINSBERG 6034 Lake Shore Dr S Seattle, WA 98118	Occupation			37.00	37.00
03/26/16	JAMES THOMPSON 231 26th Ave E Seattle, WA 98112	Occupation			37.00	37.00
03/26/16	NICOLE TORRES 323 Williams Ave N Renton, WA 98057	Occupation			65.00	65.00
03/26/16	SLYVIA JOHNSON 303 36th Ave E Seattle, WA 98112	Occupation			37.00	37.00
03/26/16	CARLA GRANAT 414 29th Ave E Seattle, WA 98112	Occupation			37.00	37.00
03/26/16	RALPH STEPHAN 4039 39th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	SYLVESTER HILL 4131 49th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	JOHN MCKEEHAN 3809 41st Ave S Seattle, WA 98118	Occupation			5.00	5.00

Page Total 305.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 5

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	ELEANOR HAMBURGER 5803 Seward Park Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	KELON GARNER 4712 S Morgan St Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	ROBERT JARMICK 4232 48th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	KAREN DEWINTER 4025 50th Ave S Seattle, WA 98118	Occupation			15.00	15.00
03/26/16	PETE NEILEDER 4414 50th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	JULIE CELLA 3856 38th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	DIANE BROUSSALIAN 9648 59th Ave S Seattle, WA 98118	Occupation			1.00	1.00
03/26/16	DANIEL CARACCIOLO 4217 S Adams St Seattle, WA 98118	Occupation			7.00	7.00
03/26/16	IRENE CHIN 9501 Waters Ave S Seattle, WA 98118	Occupation			1.00	1.00
03/26/16	SUZANNE WIGGINS-ACKERSON 10358 Rainier Ave S Seattle, WA 98178	Occupation			2.00	2.00
03/26/16	JACQUELINE JOHNSTON 9520 Waters Ave S Seattle, WA 98118	Occupation			13.00	13.00

Page Total 104.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 6

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	DAWN YORKER 9443 58th Ave S Seattle, WA 98118	Occupation			3.00	3.00
03/26/16	ROWAN WALSH 11012 56th Ave S Seattle, WA 98178	Occupation			3.00	3.00
03/26/16	SARA SMITH 9616 54th Ave S Seattle, WA 98118	Occupation			1.00	1.00
03/26/16	JESSICA HERNANDEZ 5135 1/2 S Hazel St Seattle, WA 98178	Occupation			4.00	4.00
03/26/16	JOHN BARBER 3421 E Superior St Seattle, WA 98122	Occupation RETIRED			60.00	110.00
03/26/16	RICHARD BRYAN 5619 S Leo St Seattle, WA 98178	Occupation			2.00	2.00
03/26/16	MARCONI TULIAO 6908 Martin Luther King Ave S Seattle, WA 98118	Occupation			2.00	2.00
03/26/16	SONYA HARRIS 5320 S Leo St Seattle, WA 98178	Occupation			1.00	1.00
03/26/16	MELANIE OBENG 9845 60th Ave S Seattle, WA 98118	Occupation			40.00	40.00
03/26/16	KIM COOK 2738 31st Ave S Seattle, WA 98144	Occupation			40.00	40.00
03/26/16	SAMANTHA CHIN 712 31st Ave S Seattle, WA 98144	Occupation			15.00	15.00

Page Total 171.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 7

Candidate or Committee Name (Do not abbreviate. Use full name.)
37th Legislative District Democrats

Deposit Date
03/30/16

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	PATRICIA ROBERTSON 3416 19th Ave S Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	ARWYN SMALLEY 12426 79th Ave S Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	PAT OWEN 2320 30th Ave S Seattle, WA 98144	Occupation			20.00	20.00
03/26/16	OLIVE HUNTER 8445 37th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	MARY GUILTINAN 211 Euclid Ave Seattle, WA 98122	Occupation			5.00	5.00
03/26/16	CONNIE COFFMAN 839 30th Ave S Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	LOUISE PITELL 334 Lakeside Ave S #301 Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	JOSEPH GRANATIR 216 32nd Ave Seattle, WA 98122	Occupation			5.00	5.00
03/26/16	DANIEL MOORE 2715 19th Ave S Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	COLLEEN CLOSE 9742 Arrowsmith Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	MARIA ZAZYCKI 5727 S Victor St Seattle, WA 98178	Occupation			20.00	20.00

Page Total 105.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 8

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	ANNE REDMAN 3300 Lakewood Ave S Seattle, WA 98144	Occupation			40.00	40.00
03/26/16	JOHN BERQUIST 4401 48th Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	STEVE MORRIS 3834 37th Ave S Seattle, WA 98118	Occupation			7.50	7.50
03/26/16	SONJA ENGELSEN 3834 37th Ave S Seattle, WA 98118	Occupation			7.50	7.50
03/26/16	SUSAN WILBURN 9746 Rainier Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	JOSE BROTO 9746 Rainier Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	CHARLOTTE ZACKERY 4052 Courtland Pl S Seattle, WA 98118	Occupation			25.00	25.00
03/26/16	KEVIN FUNG 3800 S Horton St Seattle, WA 98144	Occupation			32.50	32.50
03/26/16	SUSAN FUNG 3800 S Horton St Seattle, WA 98144	Occupation			32.50	32.50
03/26/16	ROBIN IVERSON 4233 48th Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	MICHAEL LOBALZO 232 Wells Ave N Renton, WA 98057	Occupation			65.00	65.00

Page Total 290.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 9

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37th Legislative District Democrats

Deposit Date
03/30/16

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	KUSHA KARIMI 1701 12th Ave S #410A Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	BECKY JONES 1701 12th Ave S #410A Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	KRISTI HENDRICKSON 2103 29th Ave S Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	TIM FROMMER 2010 28th Ave S Seattle, WA 98144	Occupation			20.00	20.00
03/26/16	SAMUEL JAMES 10129 66th Ave S Seattle, WA 98178	Occupation			30.00	30.00
03/26/16	ROBERT LINDSEY 10129 66th Ave S Seattle, WA 98178	Occupation			30.00	30.00
03/26/16	NANCY ROTECKI 4615 S Adams St Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	ELIJAH ZUPANCIC 3318 34th Ave S Seattle, WA 98144	Occupation			20.00	20.00
03/26/16	EYAL LEVY 4015 S Court St Seattle, WA 98144	Occupation			25.00	25.00
03/26/16	ZEHARA CHEN-LEVY 4015 S Court St Seattle, WA 98144	Occupation			25.00	25.00
03/26/16	PAMELA COOK 6020 S Redwing St Seattle, WA 98118	Occupation			55.00	55.00

Page Total 240.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 10

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00			P R I	G E N	Amount	Aggregate Total*
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State				
03/26/16	ALLEN JEFFERSON 3819 S Lyon Ct Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	CLAUDE BURFECT 11243 57th Ave S Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	JONATHAN RODRIQUEZ 3910 S Eddy St Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	DARLENE DAVIS 4014 S Holly St Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	ALMA MARION 5304 S Avon St Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	DEIRDRE KNOWLES 11219 59th Ave S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	APRIL LINDENER 11258 57th Ave S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	H KUMASAKA 11214 56th Ave S Seattle, WA 98178	Occupation			20.00	20.00
03/26/16	JEAN BRAGASSA 11237 57th Ave S Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	REMEDIOS DAQUIGAN 11436 70th Pl S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	HELMUT CERNY 10250 Waters Ave S Seattle, WA 98178	Occupation			25.00	25.00

Page Total 120.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 11

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
--	--------------------------

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	VINCENT LIU 2205 A 14th Ave S Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	IRA MOSS 4038 41st Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	WENDY BLISS 4419 41st Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	ANDREA REICHARDT 3742 S Perry St Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	H RANDALL WEBB 1758 18th Ave S Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	JUDY BRANDON 1758 18th Ave S Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	ANGELA DEPPE 4427 38th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	DAN LANDES 4427 38th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	AB MATTSON 10410 Rainier Ave S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	DALE RECTOR 5909 S Fletcher St Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	JASON DICK 5306 S Fletcher St Seattle, WA 98118	Occupation			5.00	5.00

Page Total 125.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 12

Candidate or Committee Name (Do not abbreviate. Use full name.)
37th Legislative District Democrats

Deposit Date
03/30/16

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	ANESSA NOVASIO 10017 Renton Ave S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	ANDREW CRAFT 334 Lakeside Ave #207 Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	SALLY CRAFT 334 Lakeside Ave #207 Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	JANE CUNNINGHAM 3200 S Norman St Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	DAVID BRUCK 3200 S Norman St Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	ELIZABETH DENNIS 226 Euclid Ave Seattle, WA 98122	Occupation			10.00	10.00
03/26/16	KENNETH HAGEN 6415 S Hazel St Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	JEANETTE HAGEN 6415 S Hazel St Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	LORENZO GARCIA 10802 Beacon Ave S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	YVONNE MAJETTE 4134 41st Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	MARGARET CRAIN 4024 42nd Ave S Seattle, WA 98118	Occupation			10.00	10.00

Page Total 100.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 13

Candidate or Committee Name (Do not abbreviate. Use full name.)
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Deposit Date
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	LINDA ROMANOVITCH 4024 42nd Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	LINDA VACCHIERY 4023 Cascadia Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	PAUL ENGLIS 4046 41st Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	SCOTT FRASER 4046 41st Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	JEAN CATELLANI 3322 35th Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	TYLER MOORE 3320 34th Ave S Seattle, WA 98144	Occupation			20.00	20.00
03/26/16	MATT HARRINGTON 4908 S Snoqualmie St Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	JEANNIE O'BRIEN 4224 51st Ave S Seattle, WA 98118	Occupation			40.00	40.00
03/26/16	JASON NERIDA 4045 38th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	LYNNE GOODRICH 4107 50th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	IRMA JEAN HILL 4203 S Adams St Seattle, WA 98118	Occupation			10.00	10.00

Page Total 190.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 14

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Deposit Date
03/30/16

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	SUSAN BLAKE 9830 59th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	CHRIS PERSONS 9941 64th Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	WAYNE ROHAY 9625 57th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	CONSTANCE LOSVAR 9355 54th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	JEANNE REINA 9320 Lima Terrace S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	JAMES PRAYTOR 9708 57th Ave S #4 Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	RONALD STANEK 9708 57th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	JERRY DORSEY 5360 S Leo St Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	ROSELLA BRAXTON 5360 S Leo St Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	ANDREW MORAVEC 201 Yesler Way #1204 Seattle, WA 98104	Occupation			20.00	20.00
03/26/16	ANNALISA CHASAN 2717 31st Ave S Seattle, WA 98144	Occupation			10.00	10.00

Page Total 130.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 15

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	KERI LINDQUIST 6314 S Bangor St Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	NICHOLAS LITERSKI 10814 66th Ave S Seattle, WA 98178	Occupation			20.00	20.00
03/26/16	TYLER BANKS 1541 13th Ave S #2 Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	KEVIN SHIVELY 1814 12th Ave S #204 Seattle, WA 98144	Occupation			10.00	10.00
03/26/16	JOHN SAFRANEK 10243 63rd Ave S Seattle, WA 98178	Occupation			50.00	50.00
03/26/16	MEG SAFRANEK 10243 63rd Ave S Seattle, WA 98178	Occupation			50.00	50.00
03/26/16	CECILIA MATTA 10226 65th Ave S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	CHRIS WAGNER 10473 67th Ave S Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	CELIA RODRIGEZ 10437 67th Ave S Seattle, WA 98178	Occupation			10.00	10.00
03/26/16	ALISON DANYER 2017 16th Ave S Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	BETH COOPER 2366 17th Ave S Seattle, WA 98144	Occupation			10.00	10.00

Page Total 190.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 16

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	ANDREA PTAK 6542 52nd Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	SHARON CHISM 6865 Molly Park Dr S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	SETH TOMPKINS 4705 S Morgan St Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	URSALA OPALKA 4015 S Chicago St Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	WILLIAM JUSTYK 3510 S Morgan St Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	SUSAN KILCUP 9202 36th Ave S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	ANNE BRYANT 10447 Waters Ave S Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	DEVON DOUGHMAN 3812 Cheasty Blvd S Seattle, WA 98108	Occupation			40.00	40.00
03/26/16	CLAIRE KONING 2701 S Walden St #4 Seattle, WA 98144	Occupation			20.00	20.00
03/26/16	MAKONEN REDAE 7826 S 115th Pl Seattle, WA 98178	Occupation			20.00	20.00
03/26/16	JAMES DUNCAN 7703 S 128th st Seattle, WA 98178	Occupation			10.00	10.00

Page Total 145.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 17

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	JEFFREY WATANABE 5700 S Victor St Seattle, WA 98178	Occupation			5.00	5.00
03/26/16	EMILY REBER-MARINIELLO 4418 49th Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	JIKIZIZWE GQIBA-KNIGHT 4804 S Adams St Seattle, WA 98118	IEngery Systems, Inc. Seattle, WA Occupation ATTORNEY			20.00	120.00
03/26/16	AMY YOUNT 4025 50th Ave S Seattle, WA 98118	Occupation			20.00	20.00
03/26/16	ALIETE ANTUNES 3318 Wetmore Ave S Apt E Seattle, WA 98144	Occupation			25.00	25.00
03/26/16	GENEVIEVE BRYANT 2216 15th Ave S Apt B Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	BORIS MEZHIBOVSKIY 223 Meadow Ave N Renton, WA 98057	Occupation			5.00	5.00
03/26/16	MARIEL MOORE 2706 31st Ave S Renton, WA 98144	Occupation			5.00	5.00
03/26/16	KARLA MANUS 11215 Cornell Ave S Seattle, WA 98178	Occupation			2.00	2.00
03/26/16	SHIRLEY GOUGH 3002 S Walker St Seattle, WA 98144	Occupation			30.00	30.00
03/26/16	ERICK SALAZAR 5678 S Fountain St Seattle, WA 98178	Occupation			20.00	20.00

Page Total 142.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 18

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00			P R I	G E N	Amount	Aggregate Total*
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State				
03/26/16	RYAN EASTHAM 118 Prefontaine Pl S #509 Seattle, WA 98104	Occupation			10.00	10.00
03/26/16	TAITE PRYOR 1336 13th Ave S Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	BRETT ECKELBERG 3611 S Cloverdale St Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	CHRISTINA CHAVEZ 3858 Cascadia Ave S Seattle, WA 98118	Occupation			5.00	5.00
03/26/16	EGAN KOLB 6210 48th Ave S Seattle, WA 98118	Occupation			3.00	3.00
03/26/16	SHARON BRIGANCE 9335 Lima Ter S Seattle, WA 98118	Occupation			10.00	10.00
03/26/16	LEONOR ROBLES 5312 S Fountain St Seattle, WA 98178	Occupation			2.00	2.00
03/26/16	SHAWN LOONEY 2119 B 15th Ave S Seattle, WA 98144	Occupation			2.00	2.00
03/26/16	HANNAH RULE 2312 15th Ave S Seattle, WA 98144	Occupation			4.00	4.00
03/26/16	PERCY HAWKES 1526 18th Ave S Seattle, WA 98144	Occupation			6.00	6.00
03/26/16	PETER DONOVAN 1526 18th Ave S Seattle, WA 98144	Occupation			7.00	7.00

Page Total 59.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 19

Candidate or Committee Name (Do not abbreviate. Use full name.)
37th Legislative District Democrats

Deposit Date
03/30/16

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	KAM BUTLER 11426 71st Pl S Seattle, WA 98178	Occupation			6.00	6.00
03/26/16	CHRISTINE ZIEMNIK 2332 15th Ave S Seattle, WA 98144	Occupation			1.00	1.00
03/26/16	KARA HAFKEY 6724 35th Pl S Seattle, WA 98118	Occupation			1.00	1.00
03/26/16	MINDY CARSON 4219 43rd Ave S Seattle, WA 98118	Occupation			1.00	1.00
03/26/16	BARTJA WACHTEL 3831 43rd Ave S Seattle, WA 98118	Occupation			1.00	1.00
03/26/16	JANEL THURGOOD 4215 51st Ave S Seattle, WA 98118	Occupation			6.00	6.00
03/26/16	DAVID WINIECKI 1505 13th Ave S #6 Seattle, WA 98144	Occupation			2.00	2.00
03/26/16	JANET DOWD 4721 S Dakota St Seattle, WA 98118	Occupation			8.00	8.00
03/26/16	HEIDI FRANKENHAUSER 1509 26nd Ave S Seattle, WA 98144	Occupation			3.00	3.00
03/26/16	ROB GILLESPIE 539 Martin King Jr Way S Seattle, WA 98144	Occupation			12.00	12.00
03/26/16	KIM SHELL 4622 46th Ave S Seattle, WA 98118	Occupation			2.92	2.92

Page Total 43.92

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 20

Candidate or Committee Name (Do not abbreviate. Use full name.) 37th Legislative District Democrats	Deposit Date 03/30/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/26/16	ERIC DAHLKE 10200 63rd Ave s Seattle, WA 98178	Occupation			25.00	25.00
03/26/16	MICHELE FOUCAULT 321 Jackson Ave S Seattle, WA 98104	Occupation			4.00	4.00
03/26/16	BERNITA MCKINION 501 S Fifth St #101 Renton, WA 98057	Occupation			20.00	20.00
03/26/16	CARLA TORGERSON 3400 E Superior St Seattle, WA 98122	Occupation			10.00	10.00
03/26/16	ART TOGERSON 3400 E Superior St Seattle, WA 98122	Occupation			10.00	10.00
03/26/16	MACKENZIE MARTIN 2344 28th Ave S Seattle, WA 98144	Occupation			5.00	5.00
03/26/16	STEPHEN MARTIN 3723 S Holly Park Dr Seattle, WA 98118	Occupation			11.00	11.00
03/26/16	SUSAN SHERBINA 1301 Sturgus Ave S Seattle, WA 98144	Occupation			100.00	100.00
		Occupation				
		Occupation				
		Occupation				

Page Total 185.00



**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.pdcca.wa.gov

May 17, 2019

Sent electronically to evan.t.phillips@gmail.com and ewan@workerlaw.com

Subject: Complaints filed by Glen Morgan, PDC Case 26340

Dear: Evan Phillips:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) alleging that the 37th Legislative District Democrats violated RCW 42.17A.235 and .240 for failure to timely and accurately report contributions, expenditures, and debt, failure to provide proper expenditure descriptions, and RCW 42.17A.220 for accepting anonymous contributions in excess of the allowable limit without forfeiting the excess amount to the State of Washington.

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.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter to Mr. Morgan. This formal written warning comes with staff's expectation you to file timely and complete reports in future years in accordance with PDC laws and rules. This includes reporting subvendor information and debt under WAC 390-16-042.

In the response filed on behalf of the 37th District Democrats regarding disclosing debts and obligations, Laura Ewan stated, "the word 'may' is permissive here, and this should be taken into account." Please note, the permissive "may" does not allow filers to decide whether to disclose debts and obligations. Rather, it means that the filer may, or is permitted to, include an estimate of the total obligation in lieu of the actual cost, if the actual cost is not known when the filer enters into a purchase agreement. This understanding is supported by the context of the statement which states obligations "*may be reported as estimated obligations until actual payment is made . . .*" (emphasis added).

The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 _____

Peter Lavalley
Executive Director



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

May 17, 2019

Sent Electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: 37th Legislative District Democratic Central Committee, PDC Case 26340

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 11, 2017.

Your complaints alleged that the 37th Legislative District Democratic Central Committee (Committee) may have violated: (1) RCW 42.17A.235 and .240 for failure to accurately and timely file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports); (2) RCW 42.17A.240 for failure to properly report expenditures and debts on C-4 reports, including the failure to provide proper expenditure descriptions; and (3) RCW 42.17A.220 for accepting anonymous contributions in excess of the allowable limit without forfeiting the excess amount to the State of Washington.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the Committee, and the response of Laura Ewan, legal counsel,

on behalf of the Committee, submitted to the PDC and the Washington State Attorney General's Office (AGO), to determine whether the record supports a finding of one or more violations. You stated the allegations in allegation (5) were based "on information and belief" but you failed to provide any evidence to substantiate the allegations. Therefore, staff did not review allegation (5).

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

- The 37th Legislative District Democratic Central Committee is a Bona Fide Political Party Committee for the 37th Legislative District, located in Seattle, King County.
- The Committee's most recent C1-PC was filed February 13, 2019, with the Committee choosing the Full Reporting option and listing Stephen Reed as campaign manager and Chase Cross as treasurer.

Allegation #1: Failure to timely and accurately file C-3 and C-4 reports

- The complaint alleged the Committee failed to timely file C-3 and C-4 reports between July 2016 and September 2017. You attached a spreadsheet of those reports.
- In her response, Ms. Ewan stated, "The Committee asserts that any instances of late filings were never done intentionally or willfully, and were certainly not so widespread as to merit intervention by any court."
- During the 2016 election year, the Committee filed a total of 92 C-3 and C-4 reports disclosing \$43,750.76 in contribution and \$42,947.24 in expenditure activities, with the majority of reports filed timely. Seven were filed as amended reports. The C-4 reports you list as late were filed monthly, and on time, because the Committee was not participating in the 2016 election.
- During the 2017 election year, the Committee filed a total of 114 C-3 and C-4 reports disclosing \$16,056.43 in contribution and \$11,615.36 in expenditure activities, with the majority of reports filed timely. Eight were filed as amended reports. The C-4 reports you list as late was filed monthly, and on time, because the Committee was not participating in the 2017 election.

Allegation #2: Failure to disclose debts and obligations on C-4 reports.

- The complaint alleged that the Committee failed to disclose debts and obligations on C-4 reports and properly provide detailed breakdown descriptions of expenditures. You attached a spreadsheet of those expenditures.
- In the Committee's response, Ms. Ewan cited RCW 42.17A.005(20), "For the purposes of this chapter, agreements to make expenditures, contracts, and promises to pay may be reported as estimated obligations until actual payment is made," stating, "the word 'may' is permissive here, and this should be taken into account."
- The PDC informed Ms. Ewan and the Committee, noting the permissive "may" does not allow filers to decide whether to report an expenditure. Rather, it means that the filer may, or is permitted to, include an estimate of the total expenditure in lieu of the actual cost, if the actual cost is not known when the filer enters into a purchase agreement. This understanding is supported by the context of the statement which states obligations "*may be reported as estimated obligations until actual payment is made . . .*" (emphasis added).

- Staff expects the 37th Legislative District Democrats to timely file all future required reports and disclose debts and obligations in future years.

Allegation #3: Failing to provide sub-vendor information for expenditures disclosed on C-4 reports

- The complaint alleged that the Committee failed to properly provide detailed descriptions of expenditures. You attached a spreadsheet of those expenditures.
- Expenditures for meeting materials do not require a quantity breakdown.
- Ewan stated “Clearly, not all of his allegations are correct: listing a facilitator’s name as the recipient of an expenditure cannot actually be a “failure to identify a subvendor”—because the facilitator is the vendor.”
- The Committee made good faith efforts to comply with the reporting requirements of RCW 42.17A.240 concerning expenditures undertaken by the campaign on their C-4 reports. The public was not deprived of critical information as the dates, amounts, and purposes of the expenditures were disclosed, and requiring further amendments to disclose the subvendors would not have a significant or material impact on the public.

Allegation # 4: Collection of more than \$300 in anonymous contributions.

- Ewan stated, “In the calendar year at issue, the Committee did not believe that the total unidentified contributions would surpass the one percent or \$300 cutoff required by law, based on projections for total contributions. Any excess was inadvertently retained. We have since submitted the excess to the State treasurer, as required by law.”
- The Committee reported a November 27, 2017 expenditure to the State of Washington for \$358.51 for Contribution to the General Fund per RCW 42.17A.220(4).

Based on these findings, staff has determined that in this instance, the failure to timely and accurately file reports of contributions and expenditures and disclose debts and obligations does not amount to an actual violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(b), the 37th Legislative District Democrats will receive a formal written warning concerning the Committee’s failure to comply with filing requirements as noted in this letter.

The formal written warning will include staff’s expectation that the 37th Legislative District Democrats timely file all future required reports of contributions and expenditures and disclose debts and obligations. The Commission will consider the 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 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

Endorsed by,

/s_____

Peter Lavallee
Executive Director

/s_____