



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

September 3, 2019

Delivered electronically to “jay@bluewavepolitics.com”

Subject: Complaint filed by Glen Morgan, PDC Case 54984

Dear Alliance for Gun Responsibility ERP Committee:

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 Glen 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s

Fox Blackhorn
Compliance Coordinator 2

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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September 3, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Alliance for Gun Responsibility ERP Committee,
PDC Case 54984

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 17, 2019. Your complaint alleged that the Alliance for Gun Responsibility ERP Committee (Respondent), a political committee in support of the 2016 ballot proposition for the Temporary Prevention of Owning Firearms, 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 the Respondent; 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:

- 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, the Respondent accepted anonymous contributions in the amount of \$874, which was \$574 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 the Respondent found the committee could accept the greater amount of up to 1 percent of the total accumulated contributions.
- At no point did the Respondent exceed either applicable limitation on anonymous contributions in calendar year 2016.

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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

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

cc: Alliance for Gun Responsibility ERP Committee