



**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

August 27, 2019

Sent electronically to debra.entenman@gmail.com and josie@bluewavepolitics.com

Subject: Complaints filed by Glen Morgan, PDC Case 55049

Dear: Debra Entenman and Josie Olsen

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) alleging Debra Entenman violated RCW 42.17A.220(4) for accepting and retaining over-limit anonymous contributions during the 2018 calendar year.

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 Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
for Peter Lavallee
Executive Director



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August 27, 2019

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

Subject: Debra Entenman, PDC Case 55049

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed July 17, 2019.

Your complaint alleged that Debra Entenman, a Candidate for State Representative from the 47th Legislative District in 2018 may have violated RCW 42.17A.220(4) for accepting over limit anonymous contributions.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Josie Olsen, of Blue Wave Political Partners, LLC and Treasurer for Elect Debra Entenman (Committee); the applicable PDC reports filed by the Committee; 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:

- Debra Entenman was elected to the State Legislature in November 2018, representing the 47th Legislative District.
- 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 2018, the Committee accepted anonymous contributions in the amount of \$600, which was \$300 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 Committee found the Committee could accept the greater amount of up to 1 percent of the total accumulated contributions.
- In the response, Olsen noted "the RCW 42.17A.220(4) that Mr. Morgan cites clearly states: 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."
- Olsen then stated "The Committee raised \$335,855.29 in 2018. In this instance, one percent of the total raised in the calendar year was greater than the \$300 limit, and therefore the Committee adhered to the one percent limit of \$3,358.55. The \$600 total in anonymous funds accepted by the committee in 2018 is well below the limit allowed by state law."

Based on these findings staff has determined in this instance the alleged acceptance of anonymous contributions in excess of the allowable limit without forfeiting the excess amount to the State of Washington does not appear to be a violation warranting further investigation.

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_____

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Deputy Director
for Peter Lavalley
Executive Director