

## State of Washington PUBLIC DISCLOSURE COMMISSION

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September 4, 2019

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Thurston County Democratic Central Committee, PDC Case 55069

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 Thurston County Democratic Central Committee, may have violated RCW 42.17A.222(4) for accepting over limit anonymous contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by the Respondent; and reviewed the Respondent's data in the PDC contribution database, to determine whether the record supports a finding of one or more violations.

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

- On February 14, 2016, the Thurston County Democratic Central Committee timely filed a Committee Registration (C-1pc report) as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option, and listing Katie Nelson and Katrina Simmons as Committee Manager and treasurer, respectively. The Committee has been registered and reporting with the PDC since 2012.
- 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, the PDC guidance outlines the amount of anonymous contribution(s) a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2016, the Thurston County Democratic Central Committee accepted anonymous contributions in the amount of \$886.49, which is \$586.49 more than the allowable limit of \$300.
- Staff review of the Monetary Contribution reports (C-3 reports) and the Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Thurston County Democratic Central Committee found the committee could accept the greater amount of up to 1% of the total accumulated contributions.

• In its response to the allegation, the Committee stated... "per RCW 42.17A.220(4), anonymous donations are limited to \$300 or 1% of the contributions received in the calendar year, whichever is higher. The Thurston County Democratic Central Committee did not exceed the anonymous contribution limit during 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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov

| Sincerely,                      | Endorsed by,   |
|---------------------------------|--|
| s/                              | s/   |
| Erick Agina, Compliance Officer | BG Sandahl, Deputy Director For Peter Lavallee, Executive Director |

cc: Thurston County Democratic Central Committee

