



**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

October 22, 2019

Delivered electronically to “info@votesatpalsidhu.com”

Subject: PDC Case 57854

Dear Satpal Sidhu:

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 be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of filing complete reports in accordance with PDC laws and rules. In addition, if you have future questions regarding use of campaign funds, please reach out to PDC staff for advice.

If you have questions, you may contact Alice Fiman 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 _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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October 22, 2019

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Satpal Sidhu, PDC Case 57854

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed September 25, 2019. Your complaint alleged Satpal Sidhu, a 2019 candidate for Whatcom County Executive, may have violated RCW 42.17A.445 and WAC 390-16-238 for personal use of campaign contributions and RCW 42.17A.240 and WAC 390-16-037 for failing to completely and accurately report expenditure details.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, and the response from Satpal Sidhu, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- Satpal Sidhu was elected to the Whatcom County Council in 2016 and filed with the PDC as a candidate for Whatcom County Executive on March 18, 2019.
- On September 10, Sidhu filed a Summary Full Campaign Contribution and Expenditure (C-4) report, listing \$72,348.94 in contributions and \$63,717.79 in expenditures during the campaign.
- Sidhu stated, "Upon review, I have instructed my Campaign Treasurer to amend any and all C4 Reports in which expenses for Printing or Advertising do not indicate the number of pieces printed and/or mailed, and the publication date of any newspaper advertising. He is currently in the process of doing that."
- On October 10, Sidhu amended the C-4 reports, adding additional expenditure detail for expenditures on August 6 to Cerrillion Partners, and August 27 to Copy Source. Also on October 10, Sidhu amended a C-4 report initially filed July 30, adding additional detail to a July 22 expenditure to Point Roberts Press and a July 26 expenditure to Cerrillion Partners.
- Sidhu also stated, "Contrary to Mr. Morgan's assertions, the indicated expenditures were all related to my election campaign as evidenced by the simple fact that had I not been running for office, I would not have made the expenditures for the seminar and the travel

thereto. The mysterious “supplies” he refers to were in fact items used at public fundraising events put on by my campaign. However, notwithstanding the above, and in order to avoid even the appearance of an improper use of campaign funds, on October 1st, I deposited a personal check into my campaign account to reimburse the campaign for all the amounts questioned by Mr. Morgan.”

- On October 16, Sidhu filed an amended Monetary Contribution (C-3) report, listing an October 1 deposit of \$1,380.44 in Miscellaneous receipts, attaching a list of the items reimbursed on pages three and four.

Based on these findings, staff has determined that, in this instance, the alleged personal use of campaign contributions and failing to completely and accurately report expenditure details does not amount a violation warranting further investigation.

PDC staff is reminding Sat pal Sidhu about the importance of completely and accurately reporting expenditure details.

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 toll-free at 1-877-601-2828 or by e-mail at fdc@fdc.wa.gov

Sincerely,

/s _____
Alice Fiman
Compliance Officer

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Executive Director