



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

November 7, 2019

Delivered electronically to “campaign@letpeoplevote.org”

Subject: PDC Case 58745

Dear Kan Qiu, Campaign Manager Let People Vote:

Below is a copy of an electronic letter sent to James Williams of Perkins Coie LLP, legal counsel representing the Washington Fairness Campaign, concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter, 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.

However, PDC staff reminds you to clarify what services a volunteer group will provide when making agreements for services outside the common volunteer functions listed in WAC 390-17-405, in accordance with PDC laws and rules.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s \_\_\_\_\_  
Alice Fiman  
Compliance Officer

Endorsed by,  
/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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November 7, 2019

Delivered electronically to [jwilliams@perkinscoie.com](mailto:jwilliams@perkinscoie.com)

Subject: Complaint regarding Let People Vote, PDC Case 58745

Dear James Williams, representing the Washington Fairness Campaign:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 16, 2019. Your complaint alleged Let People Vote, a ballot measure committee opposing Referendum 88, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately report monetary expenditures or the receipt of in-kind contributions for security provided by the Proud Boys.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; applicable PDC reports, the attachments you provided, and the response from Kan Qiu, Campaign Manager Let People Vote, to determine whether the record supports a finding of one or more violations.

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

- Let People Vote (Committee) filed a Committee Registration with the PDC as a Ballot Measure Committee on May 12, 2019. The most recent Committee Registration lists Kan Qiu as Campaign Manager and Treasurer, and Sharon Hanek as Deputy Treasurer.
- As of November 3, 2019, the Committee reports \$1.39 million in contributions and \$1.2 million in expenditures.
- In response to the complaint, Kan Qiu stated "First, we did not contract or hire anyone or any organization. We were concerned about our security due to the threats and violence against us and our volunteers during our signature collection phase, and we had mentioned our concerns. Fortunately, we had some people volunteer to help us escort our signature sheets from Bellevue to Olympia, and they helped us unload our boxes. We've had hundreds of volunteers all around the state helping us collect signatures, and this was just another volunteer effort."
- After reviewing the video provided in the complaint, Qiu added "It should be obvious that we can only speak from our experience as a volunteer group of people, and this was our first political campaign. It seems like you want us to explain why some volunteers

(who we had never met before) would make a video that doesn't appear to support the facts of this situation. We can't speak for why people make their own videos and say the things they say.”

Volunteers (who are not paid by anyone in connection with the volunteer tasks they perform) may do certain campaign work without the Committee having to report the services as in-kind contributions.

There is no indication the services provided by the Proud Boys are services the group typically provides for a fee.

Based on these findings, staff has determined in this instance the alleged failure to timely and accurately report expenditures or in-kind contributions for security from the Proud Boys does not amount to a violation warranting further investigation.

PDC staff is reminding Let People Vote about the importance of clarifying what services will be provided when making agreements with volunteers who provide services outside the common volunteer functions listed in WAC 390-17-405, in accordance with PDC laws and 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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Alice Fiman  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

Barbara Sandahl  
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For Peter Lavallee  
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