



**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.pdca.wa.gov

December 16, 2019

Delivered electronically to “egan@pridefest.org and josie@bluewavepolitics.com”

Subject: Complaint filed by Charles Schrag, PDC Case 59005

Dear Egan Orion:

Below is a copy of an electronic letter sent to Charles Schrag concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Charles Schrag, 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 Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s

Tabitha Townsend
Compliance Coordinator

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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December 16, 2019

Delivered electronically to "charlesschrag@gmail.com"

Subject: Complaint regarding Egan Orion, PDC Case 59005

Dear Charles Schrag:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 21, 2019. The complaint alleged that Egan Orion, a Candidate for City Council Member for City of Seattle may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

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

- Pursuant to RCW 42.17A.235 the Respondent is required to timely and accurately report contributions and expenditures undertaken by the campaign.
- The Respondent signed a lease for office space at 2015 E Union St 98122 in August with Mount Baker LLC, with the lease payments to begin September 1, 2019 for \$500 per month.
- Pursuant to RCW 42.17A.240 and WAC 390-16-042 the Respondent was required to report debts and obligations whose value exceed \$750 that were outstanding more than 10 business days as of the last day of the reporting period, or for more than 5 business days during the period 30 days before the election, the \$1,000 of outstanding rent from September and October was therefore due to be reported as debt on the 21-day pre-General C-4 report, which was timely filed on October 15, 2019.
- The Respondent amended the September and 21-day pre-General C-4 reports on October 29, 2019 to show each month accruing \$500 debt for the rented space, the \$750 threshold was exceeded in October 2019 and was then required to be reported as debt due to no payments yet being made to a reoccurring expenditure, such as this monthly lease payment due on the first of each month.
- As reported on the timely filed 7-day pre-General election C-4 report submitted on October 29, 2019 the Respondent made payment of the \$1,000 debt from September and October rent to Mount Baker LLC on October 28, 2019.
- The activity described falls under the concurrent jurisdiction of the Seattle Ethics and Elections Commission (SEEC), which addresses violations of the Seattle Elections Code, SMC 2.04.250 and .260 which require committees to file reports of contributions received and expenditures made at specific times during the election cycle. "Expenditure" is defined in SMC 2.04.010 to include, among other things, "a contract, promise, or agreement, whether or not legally enforceable, to make an expenditure."

- The SEEC dismissed the complaint as the Respondent remedied the reporting error timely upon notification of the error and the dollar amount of the debt in comparison to the overall expenditures made by the campaign within the 7-Day pre-General C-4 report appear to be inadvertent and minor violations.

Based on these initial findings, staff has determined that, pursuant to WAC 390-37-061(3), to defer this complaint to the jurisdiction of the SEEC because the alleged violation was resolved under an analogous local ordinance. The PDC has dismissed this complaint in accordance with RCW 42.17A.755(1) and will not be pursuing further investigation or enforcement action in this case.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

Enclosures: SEEC Dismissal Letter

cc: Egan Orion