



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

December 4, 2019

Delivered electronically to Dmitri Iglitzin on behalf of UA Local 32 Pipe PAC at  
“[iglitzin@workerlaw.com](mailto:iglitzin@workerlaw.com)”

Subject: Complaint filed by Glen Morgan, PDC Case 59212

Dear Mr. Iglitzin:

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 conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding UA Local 32 Pipe PAC about the importance of the restriction on accepting contributions exceeding \$5,000 from a single source within twenty-one days of a general election. PDC staff expects in the future that your client will comply with applicable PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director



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December 4, 2019

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding UA Local 32 Pipe PAC, PDC Case 59212

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 24, 2019. The complaint alleged that UA Local 32 Pipe PAC, a political committee registered during the 2018 primary and general elections, may have violated RCW 42.17A.420 for accepting contributions exceeding \$5,000 from a single source within twenty-one days of the November 6, 2018 general election.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Dmitri Iglitzin, on behalf of his client UA Local 32 Pipe PAC; the applicable PDC reports filed by Respondent; and queried the Respondent’s 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:

- UA Local 32 Pipe PAC was registered as a Continuing Political Committee under the “Full Reporting” option, for calendar year 2018.
- UA Local 32 Pipe PAC participated in the 2018 primary and general elections and was required to submit a Monetary Contribution report (C-3 report) each Monday for any bank deposit made during the previous seven calendar days, and required to disclose campaign activity on a monthly basis if more than \$200 was received or expended since the last Summary Full Campaign Contribution and Expenditure report (C-4 report) was filed and was required to file the following C-4 reports:
  - A 21-day and a 7-day Pre-Primary Election C-4 report.
  - A Post-Primary Election C-4 report.
  - A 21-day and a 7-day Pre-General Election C-4 report.
  - A Post-General Election C-4 report.
- RCW 42.17A.420 prohibits a political committee from accepting contributions exceeding \$5,000 dollars in the aggregate from one source within twenty-one days of a general election.
- On October 25, 2018, UA Local 32 Pipe PAC submitted a C-3 report disclosing a \$50,000 contribution from United Association Local 32 Plumbers, Pipefitters & HVAC/Refrigeration Mechanics Union received on October 18, 2018 and deposited on October 25, 2018.

- The complaint alleged that the \$50,000 contribution received on October 18, 2018, exceeded the allowable contribution limits of no more than \$5,000 in aggregate from one source which began two days earlier on October 16, 2018.
- In his response, Mr. Iglitzin referenced a decision made by the Ninth Circuit Court of Appeals, *Family PAC v. McKenna*, in which the court found the application of RCW 42.17A.420(1) unconstitutional. Mr. Iglitzin stated that although the circumstances in the court's decision were not entirely consistent with those in his client's case, that the complaint should be dismissed. In addition, he stated that the alleged over limit contribution did not impact UA Local 32 Pipe PAC's ability make expenditures during the twenty-one days as his client had \$34,283.78 in cash on hand as of October 16, 2018 and only spent \$3,250 during the twenty-one days before the general election.

During its review, staff found that of the reported \$24,750 dollars in total campaign contributions made by UA Local 32 Pipe PAC during the 2018 election, more than sixty-seven percent went to candidates during the primary election. A total of \$8,000 dollars in additional contributions was made on September 17, 2018 and October 17, 2018, to candidates participating in the November 6, 2018 general election. It appears that UA Local 32 Pipe PAC did not use any of the funds received from United Association Local 32 Plumbers, Pipefitters & HVAC/Refrigeration Mechanics Union on October 18, 2018 to make contributions to 2018 candidate campaigns.

Based on our findings staff has determined that, in this instance, accepting a contribution exceeding \$5,000 from a single source within twenty-one days of the November 6, 2018 general election, does not amount to a violation that warrants further investigation.

PDC staff is reminding UA Local 32 Pipe PAC about the importance of the restriction on accepting contributions exceeding \$5,000 from a single source within twenty-one days of a general election and all other applicable statutes 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, you may contact Jennifer Hansen at 1-360-586-4560, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Dmitri Iglitzin, Attorney for UA Local 32 Pipe PAC