



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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January 16, 2020

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding SeaTac Progress (Sponsored by John Wyble), PDC Case 59312

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 25, 2019. Your complaint alleged that SeaTac Progress, a Single Election Year Political Committee in 2019, may have violated RCW 42.17A.240 by failing to accurately disclose contributor address and RCW 42.17A.320 for failure to accurately disclose the Top 5 Contributors on political advertising.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by SeaTac Progress (Committee); and reviewed their data in the PDC database, to determine whether the record supports a finding of one or more violations.

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

- On September 20, 2019, the Committee filed a Committee Registration (C-1pc) selecting the Full Reporting option and listing Jason Bennett and John Wyble as the Ministerial Treasurer and Campaign Manager, respectively. On October 5, 2019, the Committee amended its Committee Registration to include "Sponsored by John Wyble" and again on October 15, 2019, to remove "Sponsored by John Wyble" since his contribution fell below the 80% threshold.
- RCW 42.17A.320(2)(b) states in part that, "If the sponsor is a political committee, the statement: "Top Five Contributors," followed by a listing of the names of the five persons making the largest contributions."
- On or about October 19, 2019, voters in the City of SeaTac, Washington received a mailer produced by the Committee depicting the Top Five Contributors as John Wyble, Andrea Newman, AJ Campenelli, Abdirahman Yussuf and Richard Harwood. Per the Monetary Contribution (C-3) report filed by the Committee on October 21, 2019, the contributions from the Top Five Contributors depicted supra were received on the following dates:
 - John Wyble: \$10,000 on 9/30/2019
 - Andrea Newman: \$200 on 10/11/2019
 - AJ Campenelli: \$111 on 10/11/2019
 - Abdirahman Yusuf: \$100 on 10/11/2019
 - Richard Harwood: \$100 on 10/11/2019

- On October 11, 2019, the same day that the Top Five Contributors' donations/contributions were received, the Committee also received \$1000 in contribution from Lucinda Grande. However, this donation was not included in the Top Five Contributors on the mailer, even though this contribution was more than the contributions received from the four contributors listed in the Top Five Contributors list on the mailer sent to voters in the City of SeaTac. The same applies to the \$1,500 contribution received from the Washington Teamsters Legislative League PAC on October 11, 2019.
- In its response to this allegation, the Committee, through its treasurer stated, "Lucinda's donation came in after the other donations came in and after the mail piece went to print. The fact she was listed on the Top 5 on the other mail piece that Mr. Morgan submits in his next complaint is proof that there was no violation here. Further, the Teamsters donation wasn't received until 10/30 so wouldn't be required to be added until that time. All other communications had been sent off to the printer by the time that donation came in and no other communication had been ordered beyond 10/31."
- The donation received from Mia Gregerson on October 17, 2019, shows her address as 3773 S 170th Street in SeaTac on the C-3 report filed with the PDC on October 21, 2019, while her voter registration shows a different residential address. In its response to this allegation, the Committee stated, "the claim that folks who donate must donate from accounts at their registered voting address isn't legitimate. There is no requirement that those two addresses be the same."

Based on these findings, staff has determined that, in this instance, the Committee's failure to correctly identify two of the Top Five Contributors on a mailer because of a lag in timing of when the contributions were actually received and when the mailer was sent to print, does not amount to a violation warranting further investigation.

However, staff is reminding the Committee about the importance of making sure that mailers depict the accurate Top Five Contributors in future years in accordance with the 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, you may contact Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov

Sincerely,

Endorsed by,

s/_____
Erick Agina, Compliance Officer

s/_____
BG Sandahl, Deputy Director
Peter Lavalley, Executive Director

cc: Jason Bennett, SeaTac Progress Treasurer