



**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, PDC Case 59579

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 1, 2019. Your complaint alleged that SeaTac Progress, a Single Election Year Political Committee in 2019, may have violated RCW 42.17A.320 and .350 for failure to accurately and completely disclose top contributors on political advertising, and RCW 42.17A.240 for failure to accurately disclose contributor names.

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 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."
- RCW 42.17A.350(2) states in part that, "If one or more of the top five contributors is a political committee, the top three contributors to each of those political committees during the same period must be identified, and so on, until the individuals or entities other than political committees with the largest aggregate contributions to each political committee have been identified."
- On or about November 1, 2019, voters in the City of SeaTac, Washington received a mailer produced by the Committee depicting the Top Five Contributors as John Wyble, SEIU WA State Council PAC, Lucinda Grande, Jeremy Lauzao and Christopher Folger. The mailer also depicted the Top Three Donors to PAC Contributors as SEIU Quality Care Committee, Public School Employees of WA Political Fund and SEIU Healthcare 1199NW PAC.
- On 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

- SEIU WA State Council PAC: \$3000 on 10/17/2019
- Lucinda Grande: \$1000 on 10/11/2019
- Jeremy Louzao: \$250 on 10/12/2019
- Christoph Folger: \$200 on 10/20/2019

- Three other contributors gave more than \$250 to the Committee before the mailer at issue in this complaint was mailed to voters but were not included in the Top Five Contributors list. Sandra Hunt, Cynthia Domingo and Richard Harwood contributed \$300, \$275 and \$250 on October 20, 2019, October 17, 2019 and October 11, 2019, respectively.
- In its response to this allegation, the Committee, through its treasurer stated, “For this mailer he references, we were required to report the top 5 donors who contributed more than \$700 in the last 12 months prior to this mailing. Legally, that would be ONLY John Wyble, SEIU WA State Council, and Lucinda Grande at this time. Chris Folger’s donation technically was made on 10/13 but with the new online donation rules we report the date it was pushed/transferred to the account, which was 10/20. Cynthia’s and other donations came in after Christoph’s donations. Therefore, even though we legally weren’t required to report his or Jeremy’s donations, we opted for extra transparency and added a full 5 donors, regardless of the threshold.”
- On the list of the Top Five Contributors depicted on the mailer sent to the voters, the names of two of the contributors were listed as “Christoph Folger” and “Lucinda Grande” instead of Christoph Foulger and Cindy Grande, respectively. It appears that the Committee used an alternative spelling for Ms. Grande and had a typographical error in Mr. Foulger’s name.
- One of the Top Three Donors to the Committee, SEIU PEAFF, was incorrectly listed as SEIU 1199 NW. In its response to this allegation, the Committee stated, “An incorrect search on the PDC site provided us with SEIU 1199 NW instead of SEIU PEAFF, so we had a typo in the SEIU listing.”

Based on these findings, staff has determined that, in this instance, the Committee’s failure to correctly identify its Three Top Donors, including what appears to be an alternative spelling or typo in the names of the two Top Five Contributors to the Committee on the mailer, does not amount to a violation warranting further investigation.

However, staff is reminding the Committee about the importance of making sure that mailers depict accurate Top Five Contributors and Top Three Donors to the Committee when applicable 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 Lavallee, Executive Director

cc: Jason Bennett, SeaTac Progress Treasurer