



## 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)

September 11, 2020

Delivered electronically to Officers of Eastside Democratic Dinner Committee

Subject: Complaint regarding Eastside Democratic Dinner Committee, PDC Case 73884

Dear Eastside Democratic Dinner Committee Officers:

The Public Disclosure Commission (PDC) has completed its review of the complaint filed by Glen Morgan on July 15, 2020, against the Eastside Democratic Dinner Committee.

As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking any enforcement action in this matter.

The PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact Kurt Young at (360) 664-8854, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by,

/s \_\_\_\_\_  
Kurt Young  
Compliance Officer

/s \_\_\_\_\_  
BG Sandahl, Deputy Director for  
Peter Lavallee, Executive Director





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September 11, 2020

Delivered electronically to Glen Morgan

Subject: Complaint regarding Eastside Democratic Dinner Committee, PDC Case 73884

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 15, 2020. The complaint alleged that the Eastside Democratic Dinner Committee, a political committee registered with the PDC may have violated: (1) RCW 42.17A.235 and .240 by failing to disclose a \$500 contribution received from the King County Democratic Central Committee; and (2) RCW 42.17A.430 by accepting a \$1,000 contribution from the Tana Senn Surplus Funds Account and not being eligible to receive a contribution since they are not a political party organization.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements for a political party committee; the Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Eastside Democratic Dinner Committee; and the response provided by the Committee Officers of the Eastside Democratic Dinner Committee. Based on staff's review, we found the following:

- On March 13, 2020, the Eastside Democratic Dinner Committee (Committee) filed a Registration with the PDC as a continuing political committee for 2020, selecting the Full Reporting Option, and listing Janis Bristol as Ministerial Treasurer. The Registration listed the Committees Officers as Steve Kasner, Chair of the 41st District Democrats; K.C. Shankland, Chair of the 5th District Democrats; James Terwilliger, Chair of the 48th District Democrats; David Williams, Chair of the 45th District Democrats.
- According to its website, the Eastside Democrats *"are a federation of regional Democratic Party organizations that support the party building efforts of four crucial Democratic legislative district organizations."* The Eastside Democrats work collaboratively with the 5th, 41st, 45th and 48th Legislative District Democratic organizations, and the leadership of the Eastside Democrats consists of each of the four Chairs of the Legislative District Democratic organizations.
- The Eastside Democrats work *"to elect Democratic candidates to the Washington State Legislature and advance Democratic causes in our communities. Each year, the Eastside Democrats host a banquet bringing together Democratic activists, elected leaders, and party officials to raise money to support the work of our four district organizations."*

- In the response, the Committee acknowledged receiving a \$500 contribution from the King County Democratic Central Committee on June 23, 2020. However, they noted the Committee “*erroneously reported the contribution as coming from Ms. Shasti Conrad. Ms. Conrad is the chair of the King County Democratic Central Committee.*”
- The Committee stated their review of the complaint indicated that on June 23, 2020, Ms. Conrad made an online contribution as Chair of the King County Democratic Central Committee using the party’s debit card, but that “*when the ActBlue confirmation came through to our treasurer only Ms. Conrad’s name was shown on the confirmation.*” The Committee included a June 23, 2020, email from ActBlue and stating on the Subject line “(ActBlue) Shasti Conrad \$500.0 to Eastside Democrats.”
- The Committee contacted the King County Democratic Central Committee concerning the \$500 contribution and “*were informed that this contribution of \$500 was from King County Democrats and not from Ms. Conrad personally.*”
- The Committee filed an amended C-3 report disclosing “the King County Democratic Central Committee as the donor and removing Shasti Conrad’s personal name” as the contributor. Staff confirmed the Committee filed an amended C-3 report totaling \$600 on July 22, 2020, disclosing that on June 23, 2020, a \$500 contribution was received from the King County Democratic Central Committee, along with two \$50 contributions from a couple. The contributions were deposited on June 24, 2020, and the original C-3 report was timely filed by the Committee on June 28, 2020, disclosing Ms. Conrad as the contributor.
- Concerning the contribution received from the Tana Senn Surplus Funds account, the Committee acknowledged receiving the contribution from the Tana Senn Surplus Account, but that the Committee “relied on the Senn team with regards to the appropriate account from which the donation could be made. Upon learning of this error, we immediately refunded the donation of \$1,000 to the Tana Senn Surplus Account.” The Committee’s refund check was received by the Tana Senn Surplus Funds account and deposited into the surplus fund bank account on July 23, 2020, per the Committee bank records.
- Melissa Pfeifer, Treasurer for the Tana Senn Surplus Funds account stated that \$1,000 contribution had been made in error. The \$1,000 contribution was promptly refunded by the Committee and was received and deposited by the Tana Senn Surplus funds account on July 23, 2020. She stated that she filed a C-3 report for the Tana Senn Surplus funds account on July 24, 2020, disclosing the receipt and deposit of the \$1,000 refunded contribution from the Committee.
- The Committee stated they believed that these two errors “did not materially affect the public interest, beyond the harm to the policy of RCW 42.17A inherent in any violation. There were no involved expenditures. We took corrective action within five business days after being notified of the alleged noncompliance. Therefore, we respectfully request that the PDC executive director resolve this matter and close the complaint.”

PDC staff found no evidence of a material violation that would require conducting a more formal investigation into the complaint or pursuing enforcement action in this instance.

Staff found that the \$500 contribution received by the Eastside Democratic Dinner Committee from the King County Democratic Central Committee was timely received and deposited. However, due to processing issue on the part of the vendor the contributor information provided to the Committee inadvertently attributed the contribution to Ms. Conrad, the Chair of the King County Democratic Central Committee.

Once notified of the discrepancy, the Eastside Democratic Dinner Committee promptly filed an amended report disclosing the King County Democratic Central Committee as the contributor. In addition, while the surplus fund expenditure was improperly made by Tana Senn using surplus funds to a political committee, the Eastside Democratic Dinner Committee did not violate RCW 42.17.430 by receiving and depositing the \$1,000 contribution from the Tana Senn Surplus Funds Account.

The PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact Kurt Young at (360) 664-8854, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Endorsed by,

/s  
Kurt Young  
Compliance Officer

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

cc: Committee Officers, Eastside Democratic Dinner Committee

