



State of Washington
PUBLIC DISCLOSURE COMMISSION

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January 11, 2021

Delivered electronically to Glen Morgan, at glen@wethegoverned.com

Subject: Complaint regarding Don Welch, PDC Case 79715

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 29, 2020. Your complaint alleged that Don Welch, an individual, may have violated RCW 42.17A.405 for exceeding contribution limits and RCW 42.17A.205(5) and WAC 390-16-011(A)(2)) for failure to identify the name of the sponsor in the name of the Clark County is Not for Sale Political Action Committee (Committee) in the 2020 election year.

PDC staff reviewed your allegations; the applicable statute, rules, and reporting requirements; the 2020 C-3 and C-4 reports filed by the Matt Little for Clark County and the Clark County is Not for Sale campaigns; and the December 9, 2020 response to the complaint provided by Don Welch.

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

- Don Welch is an out-of-state resident who currently resides in Ellicott City, Maryland.

Alleged violation of RCW 42.17A.405 for exceeding contribution limits in the 2020 election year (RCW 42.17A.404).

- On January 3, 2020, Mr. Welch made two contributions for \$1,000 each, one for primary and the other one for the general election. The Matt Little for Clark County reported both contributions on the same C-3 received on February 9, 2020.
- On August 13, 2020, Mr. Welch contributed \$10,000 to the Clark County is Not for Sale Committee. This contribution was reported by the Clark County is Not for Sale campaign on the C-3 report received on August 16, 2020.
- Staff reviewed the Committee Registration (C1pc) filed by the Clark County is Not for Sale Committee on January 1, 2019 and the Case Receipts Monetary Contribution (C-3) report filed by the campaign on August 16, 2020, depicting a contribution of \$10,000 received from Deon Welch on August 13, 2020. Staff also found that Don Welch made two contributions of \$1,000 (for a total of \$2,000) each, to the Matt Little for Clark County campaign on January 3, 2020. Staff noted that the contributions made to the Matt Little campaign were for both the primary and general elections, and further noted that the campaign correctly

checked the respective boxes on the C-3 report to clearly depict that the first contribution of \$1,000 was for the primary and the second \$1,000 contribution was for the general election. Based on this, Mr. Welch did not exceed the contribution limit for contributions made to both campaigns.

Alleged failure to include the Committee sponsor in the name of the Committee - RCW 42-17A.205(5) and WAC 390-16-011A (2).

- Staff noted that the Clark County is Not for Sale PAC received a \$10,000 contribution from Don Welch on August 13, 2020. Between August 13 and October 31, 2020, eighty percent of the Committee's contribution was from Don Welch. The Committee was therefore by law required to amend its Committee Registration (C1pc) filed on June 10, 2019, to reflect/depict Don Welch as the sponsor in the Committee's name (Clark County is Not for Sale Sponsored by Don Welch) for the period referenced supra.

Based on these findings staff has determined that, in this instance, the Committee's failure to amend its C-1pc to add Don Welch's name in the name of the Committee as the sponsor of the Committee, does not amount to a violation warranting further investigation. The Committee will receive a reminder letter – see Case 79714.

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, Compliance Officer at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov

Sincerely,

Endorsed by,

s/_____
Erick Agina, Compliance Officer

s/_____
Barbara Sandahl, Deputy Director for
Peter Lavalley, Executive Director

cc: Don Welch