

**Respondent Name**

Kshama Solidarity Campaign

**Complainant Name**

Glen Morgan

**Complaint Description**

[Glen Morgan](#) (Thu, 29 Oct 2020 at 11:15 AM)

To whom it may concern

It has come to my attention that the Kshama Solidarity Committee PAC has violated Washington State's Campaign Finance laws in 2020 while fundraising to resist the recall campaign which has been filed against City Councilmember Kshama Sawant. Please note the C1PC for this campaign can be found linked here:

[https://apollo.pdc.wa.gov/public/registrations/registration?registration\\_id=20034](https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=20034)

The specific violations of this law are detailed below.

**1) Accepting Illegal Campaign contribution from Foreign National (Violation of RCW 42.17A.417(1))**

This PAC has accepted at least one (and probably more) contributions from a foreign national during this 2020 campaign to fight the attempt to recall her from public office. Specifically, the contribution reported on the attached C3 report (**PDC Tracking # 101003996**) – see **page 17** filed on October 7, 2020 details a political campaign contribution by Nayon Park, with a listed Seattle address. Just as a reminder, this is the same person who also illegally contributed to Kshama Sawant's campaign for Seattle City Council, but that was addressed in a separate complaint.

Nayon Park is a citizen of Korea and NOT a US citizen, by his own admission when he filed a lawsuit recently in King County against the State of Washington (along with other plaintiffs) in opposition to Washington State's campaign finance restrictions on foreign donors to political campaigns. I have attached a copy of this lawsuit as evidence. Specifically, on **Page 3, Section II "Parties, Jurisdiction and Venue" in section 1.6, it states:**

"Plaintiff Nayon Park is a citizen of South Korea and lawful F-1 visa holder who resides in Seattle, Washington. Ms. Park is a member of and steward for Local 4121. She also serves on the union's Joint Council as a Head Steward"

Nayon Park has sworn to the accuracy of this document and it should be considered sufficient evidence to prove that this contribution made to a local well-funded super PAC was illegal, and this campaign has violated Washington State's campaign finance laws, once again, in accepting this contribution.

At a minimum, this PAC must refund the illegal contributions from this donor, and a penalty must be imposed by the PDC consistent with the statute. There is an increasing concern that the campaign finance laws are not being applied equally to the powerful and politically connected, and this case should be an example that not even a powerful, vindictive Seattle City Councilmember who claims to be a Socialist can exempt themselves from complying with the laws which apply to other, much less powerful or politically connected people.

Kshama Sawant is a well-known frequent violator of campaign finance laws in Washington State. Please note, for the record, the following examples:

• **PDC Case #11340** – A complaint filed by Glen Morgan, a \$150 penalty was imposed by the SEEC after the PDC referred the matter to the Seattle Ethics and Elections Commission. In the attached letter, in addition to the additional penalty imposed as a result of this investigation, previous fines of \$1500 had been imposed for additional violations of campaign finance laws in 2016. Mostly these violation involved concealing contributions or expenditures from the public

• **PDC Case #65026** – This was another complaint filed by Glen Morgan and combined with a complaint filed by Kevin Schofield. This was referred to the SEEC where the violation was dealt with through “deferred enforcement” earlier this year. This was mainly involving misuse of public resources to promote Sawant’s political campaign.

Please let me know if you need further evidence in this matter.

Best Regards,

Glen Morgan

**What impact does the alleged violation(s) have on the public?**

The public has a right to know when foreign nationals attempt to influence local elections and and dark money Super PACs like this one.

**List of attached evidence or contact information where evidence may be found**

All attached

**List of potential witnesses with contact information to reach them**

All the people involved in this campaign.

**Certification (Complainant)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.