

To Whom it May Concern --

It has come to my attention that Manka Dhingra has committed yet further violations of **RCW 42.17A**.

1) State law prohibits candidates from accepting contributions from corporations and business entities not doing business in Washington State. RCW 42.17A.405 (12), WAC 390-17-310.

On 5/17/2017, the Dhingra campaign received a contribution of \$250.00 from the San Dimas Animal Hospital, which is located in San Dimas, California. That check was deposited on 5/22/2017.

According to their own website, the San Dimas Animal Hospital: : "...is proud to serve San Dimas, CA and surrounding areas. We are dedicated to providing the highest level of veterinary medicine along with friendly, compassionate service."

There is no business nexus between San Dimas Animal Hospital and Washington State that would enable them to qualify as a corporation or business entity doing business in Washington State under the relevant statute or rule.

This is an illegal contribution that must be refunded immediately.

2) State law establishes that candidates must return contributions that exceed the contribution limits contained in RCW 42.17A.405 within 10 days of receipt. RCW 42.17A.110, WAC 390-16-312.

As mentioned above, the Dhingra campaign received an illegal donation from an out-of-state corporation/business entity that exceeded the contribution limits contained in **RCW 42.17A.405**.

Dhingra's campaign had 10 days from 5/17/17 (the date of receipt) to return the illegal contribution but failed to do so. This is a violation of state law that must be rectified immediately.

3) State law requires campaigns to timely report contributions received. The information required to be disclosed includes the name and address of the source of contributions that exceed \$25 in the aggregate and the employer and occupation of any individual contributor giving more than \$100 in the aggregate. RCW 42.17A.240, WAC 390-16-037. Contribution disclosures are reported on a Public Disclosure Commission form "C3" which is called the "Cash Receipt Monetary Contributions" form.

Manka Dhingra's campaign failed to include the occupation of Surekha Patel, who donated \$501 to Dhingra's committee. On information and belief, she is an office manager at Amit Patel.

This legally required information was not included on Dhingra's C3 report until 6/26/17 when they submitted an amended C3. The accurate report was due on 6/5/2017, but was not submitted until 6/26/2017, **21 days past the statutory deadline.**

4) State law requires that in-kind contributions be reported on regular reports. RCW 42.17A.235, RCW 42.17A.240. Additionally, state law limits the amount of money that candidates may receive from certain entities. RCW 42.17A.405.

In an earlier complaint against Manka Dhingra, I alleged that she had received an in-kind contribution from the Sister District Project that she had illegally failed to report. Since filing that complaint, I have gathered additional evidence about the Sister District Project's involvement in Dhingra's race and have filed a complaint against the Sister District Project for failing to file as a political committee.

In light of this new evidence, I now believe that the Dhingra campaign has accepted an unreported in-kind contribution of staff time from the Sister District Project that is far in excess of the applicable limits contained in **RCW 42.17A.405**.

I am attaching the complaint I submitted against the Sister District Project so that it will supplement the evidence in this (and my previous) complaint.

5) State law establishes that candidates must return contributions that exceed the contribution limits contained in RCW 42.17A.405 within 10 days of receipt. RCW 42.17A.110, WAC 390-16-312.

As mentioned above, the Dhingra campaign received an illegal donation from the Sister District Project that I believe has surpassed the allowable limits.

Dhingra's campaign had 10 days from receiving this overlimit in-kind contribution (which I believe became "overlimit" in the middle of May) to refund the difference between the in-kind contribution and what was permissible under state law. Dhingra failed to do this -- a violation of state law.

This violation must be rectified immediately.

The PDC should investigate the possibility that Manka Dhingra committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)** . If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

I have reason to believe there are other provisions of **RCW 42.17A** that have been violated or are being violated by Dhingra's campaign. The PDC and AG's office should conduct a thorough review of Dhingra's campaign to identify all violations.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

To Whom It May Concern --

It has come to my attention that the **Sister District Project** has violated RCW 42.17A.250 by failing to register as an out-of-state political committee that is making expenditures supporting Manka Dhingra in her race for the State Senate in the 45th Legislative District. **Additionally, it may also be possible upon further investigation that out-of-state criteria are not met, and that the Sister District Project has to register as an in state political committee per RCW 42.17A.005 (37) and RCW 42.17A.205.**

This political committee appears to meet the criteria and requirements defined in RCW 42.17A.250, WAC 390-16-049 and WAC 390-16-050.

WAC 390-16-049 reads as follows:

(1) RCW **42.17A.250** governs campaign reporting in Washington state by committees located outside of Washington. The statute directs that an out-of-state political committee organized for the purpose of supporting or opposing candidates or ballot propositions in another state (and that is not otherwise required to report as an in-state committee) reports the information listed in RCW **42.17A.250** on a C5 form (WAC **390-16-050**). The committee begins reporting on a C5 form when it makes an expenditure supporting or opposing a Washington state candidate or political committee.

(2) To file as an out-of-state political committee, all the criteria in (a) and (b) of this subsection must be satisfied:

(a) **Out-of-state.** First, the committee must be located out-of-state. It must be maintaining its office or headquarters in another U.S. state or the District of Columbia, and has no office, street address or corporate registered agent in Washington state. If there is no office or headquarters in another state or the District of Columbia, and no corporate registered agent in Washington state, the political committee is deemed out-of-state if its treasurer resides in another U.S. state or the District of Columbia.

(b) **Organizational purpose and campaign activities.** Second, the committee must also be currently organized primarily for engaging in campaign activities in another state. Therefore, to qualify as a current out-of-state committee, the committee must also:

(i) Be currently registered and actively filing campaign disclosure reports in one or more other states and has been so filing for the preceding two years; and

(ii) Have organizational documents showing it was originally formed and is currently organized for the purpose of making expenditures in another state or soliciting contributions for use in another state's election campaigns; and

(iii) Have spent less than twenty percent of its aggregate expenditures for all political campaign activity nationwide at any point in any calendar year to support and/or oppose Washington candidates for state, local and judicial office, Washington ballot measures and/or Washington political committees.

(3) A committee that does not satisfy the criteria in subsection (2) of this section shall file as an in-state committee under chapter **42.17A** RCW, including RCW **42.17A.205** through **42.17A.240**.

(4) Out-of-state political committees reporting under RCW **42.17A.250** are also subject to reporting pursuant to RCW **42.17A.260** (political advertising independent expenditures) and RCW **42.17A.305** through **42.17A.315** (electioneering communications).

Background

The Sister District Project purports to be: *“a grassroots organization that matches volunteers in safe blue (or red) places with strategic local, state, and federal elections throughout the country. As a volunteer, you’ll join your local district team, led by volunteer District Captains (DCs). Your local district team will be your SDP home base. Every election cycle, SDP HQ will assign your team a Sister Race that you and your team will work together to support.”*

The organization has a large paid staff and according to e-mails obtained from a local Sister District point of contact, coordinates and assists Manka Dhingra in her campaign for state senate. As such, they have made “expenditure[s] supporting or opposing a Washington state candidate” and have to register as an out of state political committee per RCW 42.17A.250 (1).

Their paid staff appear to be assisting the Dhingra campaign by using their paid staff to solicit small donations, organize fundraisers, engage in phone banking efforts, canvassing/registration/GOTV efforts, and social media promotion.

In a YouTube video from the Sister District Project, we learn additional information about the work the organization’s paid staff performs for campaigns: (<https://www.youtube.com/watch?v=vp76CXtpCtA>)

(Start at 10:30 mark)

*“So I think I said a little bit about this. **So at headquarters we will be coordinating directly with the campaign managers and field managers in the campaigns we support as official Sister District Races.** I will have a team, I am building my team now of volunteers who will help me in this role and provide liaison volunteer services between headquarters and the various campaigns that we will be supporting. **And we will manage, at the headquarters level, the flow of that information from the campaign out to district captains and our volunteers...***

...We are building this team now and hopefully that will provide a little more insight...

*...the sorts of asks from campaign managers and campaigns will differ from race to race. **So we think it is really important for us at HQ to sort of manage that***

relationship and make sure we are providing consistent information from headquarters out to our volunteers to make sure you are getting the right and most current information in managing that process.” [emphasis added – G]

Later in the same video (13:00), the same woman says:

“Our races that we are supporting as official Sister District races in 2017 will be primarily at the State level. In particular, Virginia is a big target for us, as is Washington State, as is New Jersey...” [emphasis added – G]

At about 21:42, the woman on the far right (Lala Wu I believe) mentions that there is a district captain in Seattle named “Ross” or “Razz”. This is likely a full-time paid staffer working with the Dhingra campaign but paid by the Sister District Project for outreach efforts. As you can see from the attached, the Sister District Project is also organizing a fundraiser for Dhingra on 6/28/17.

You can see more about how they assist campaigns on their website by clicking below: <https://www.sisterdistrict.com/faq/>

As you can see attached to this complaint, there is further evidence of Sister District’s involvement in the 45th LD race.

These numerous expenditures (of staff time and other resources) benefitting Dhingra mean that the Sister District Project must register as an out-of-state political committee immediately.

The PDC should investigate the possibility that the Sister District organization committed the above violations maliciously, which would be a class C felony per RCW 42.17A.750 (2)(c).

If the PDC determines that is the case, they should refer this case to the Attorney General’s office for criminal prosecution immediately. Please don’t hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

Fwd: Manka Dhingra Campaign - Virtual Phone Bank info for 06/23-6/29

2 messages

Kathleen Kuba <kkuba@kubaco.com>

Sat, Jun 24, 2017 at 12:07 AM

To: Stein Christie and John <jsteinwa@earthlink.net>, Brad@clure.com, inshapepdx@gmail.com, JLang2330@gmail.com, suemitchell@gmail.com, Nan.monk@gmail.com, shermanpt@gmail.com, mollywestring@gmail.com, wa2north.sisterdistrict@gmail.com, cedarwaxwings@gmail.com, [REDACTED]

Hi everyone,

I hope you had a good week and are ready for a warm, sunny weekend. Below is the new passcode for this week.

When I was making calls this week I was thinking that I might share a few adaptations I have made to the script that comes up for each call in VPB. The script opens with confirming who you are speaking to and your introduction. I do this. But then the script goes on to ask how the person is. This might work for you, but it seems disingenuous when I do it, so I instead follow my intro as a volunteer with Manka Dhingra's campaign with...and I am calling to see if you need any information on this candidate. I find this a more appropriate transition to the content we want to cover. Then I cover the material but in an organic way, following the interests and questions of the person on the phone. I try to cover all the topics and provide answers to all the items we are to click on.

It takes about 10 or 15 or 20 calls for one person to answer. Once I got used to that, it seems to go more smoothly. I'm rather enjoying making the calls.

I'll be getting in touch in the beginning of July to see how many hours you were able to make calls in June and if you remember how many people you talked with, that would be great too. If you haven't had time yet to make calls, that's fine. We're just getting settled in.

Best,
Kathy

Begin forwarded message:

From: Ashley Jackson <ashley@electmanka.com>

Subject: Manka Dhingra Campaign - Virtual Phone Bank info for 06/23-6/29

Date: June 23, 2017 at 4:52:16 PM PDT

Hello!

****The following is our weekly Virtual Phonebank (VPB) with Manka email that will contain a fresh VPB passcode, good from Friday-Thursday. It contains the VPB link, passcode, a training video on talking about Manka, an audio training on the mechanics of phonebanking, and our FAQs.***

Thanks again for jumping on the phones with us on behalf of Manka. Below is your Open Virtual Phonebank (VPB) link & passcode that will **allow you to make calls until next Thursday**. I've also included our 5 min. training video on talking about Manka on the phones, as well as our FAQ sheet to help guide your phone bank experience.

Over the next few weeks we are contacting strong and likely Democrats to inform them about this year's special election and let them know why we need Manka as our next State Senator.

Preferred calling times: 5:30pm-9pm PST (this time has a better contact rate, but anytime after 11 a.m. is O.K.)

Link: [click here to access the virtual phone bank](#)

Once you click on the link, you will be prompted to create an Action ID (unless you already have an Action ID.) Once completed, you are ready to make some calls! Logging in will give you access to the script you'll use to talk to people.

Passcode: 8759220-2317

[Click here for the Training Video for Manka's Message](#)

[Click here to access the Audio Training \(how to virtual phone bank\)](#)

Have any questions before or during calltime? Contact Lainie at lainie@electmanka.com, or call/text her with immediate questions at (360)-431-9355.

Thanks for all your help!
-Team Manka

Just a reminder to join us for phonebanking tonight if you can! You can make calls from the comfort of your own home. Please make calls for any portion of the open hours that you're able to. Thank you!

TONIGHT! AND EVERY TUESDAY 6-8 PM PT
Trainings: [Audio](#) (mechanics) // [Video](#) (messaging)
This Week's [Open VPB](#) Code: 917722I-3325

Friends,

You're receiving this email because you've been assigned [Manka Dhingra, Washington State Senate, Legislative District 45](#), as your first Sister Race. Manka's campaign is getting incredible traction and attention, and for good reason. This election will determine whether Democrats have a [true majority](#) in the Washington State Senate. **Can you help us flip the 45th by making a few phone calls tonight?**

Open hours are tonight---and every Tuesday---from 6-8 PM PT. Quick first steps if you've never done this before (and welcome back, if you have!):

1. **Check out the trainings.** Listen to the campaign's training [audio](#) and watch the quick campaign training [video](#) on messaging.
2. **Login to [Open VPB](#)** (or complete the quick sign up) and when prompted, enter this VPB Code: *917722I-3325*.
3. **Start making calls!** Follow the instructions on the screen and use your own phone. You can get together with a few people for a party, or do it from the comfort of your own home.

If you have any questions during the open hours, please feel free to reach out to [Lainie Ferguson](#), one of Manka's fantastic field organizers. You can reach her at 360-431-9355 or lainie@electmanka.com.

We're holding phonebanking open hours every Tuesday from 6-8 PM PT. (Note the slight time change from previous messages---we'll be using 6-8 PM going forward.) These times are dedicated for Sister District volunteers to phonebank in parties, or individually, for Manka. **You don't have to make calls for the entire two hours---even half an hour once a week can make a big difference.** But if those times aren't convenient for you, no worries! Please just let us know by replying to this email.

Lala & Gaby
Sister District Project

Phone Banking

Janet McKinney <cedarwaxwings@gmail.com>

Sat, Jun 17, 2017 at 9:22 AM

To: [REDACTED] Bob Doll <robertjdoll@yahoo.com>

Cc: Jeff Mount <gwmount@hotmail.com>, Marc Oommen <marc.oommen@gmail.com>, Viscalla <viscalla@aol.com>

Hi [REDACTED]

Just in case you didn't receive by earlier email here is some information on the Manka phone banking. In the earlier email, there was more information on phone banking and Manka.

The Skagit Democrats are working with the local Sister Districts Project CD 1 & 2 to coordinate phone banking. Learn more about sister district project by going to <https://www.sisterdistrict.com/>.

Kathy Kuba is leading the phone banking for the Sister Districts. Please email Kathy Kuba, kkuba@kubaco.com, to get on her phone banking email list.

Kathy coordinates the phone banking and will start sending you emails with the necessary information to phone bank (like passcodes).

If you want to learn more about phone banking in person, Sister District is having a meeting Thursday, July 13, 6 to 8 pm, Burlington Library.

Thank You for your interest in helping Manka Dhingra.

Janet McKinney
Skagit County Democrats



Sister District Project shared Sister District Project - WA-7's event.

May 11

If you live in the Seattle area, please join us on Saturday for a volunteer training and to meet Manka in person!



MAY
13

Sister District All-Volunteer Meeting & ...

Sat 1 PM · Phinney Neighborhood Association · ...
Causes · 274 people

★ Interested

8

2 Comments



Like



Share



Kathy Polhemus Rawle Cannot make it. Please post info after.

Like · May 11 at 9:41am



Leslie Oldenburg Will this be available to stream?

Like · May 13 at 12:43am

Lala Wu
May 23

Weekly Sister District phonebanking for Manka tonight 6:30-8:00pm. And every Tuesday! Check out trainings, login info, and this week's access code here: <http://bit.ly/2rvlNVb>




Like Share

15

View 1 more comment

Claire Foster Phone banking tonight, 6-8pm! Tonight's open VPB code is F238221-8840.
Like · June 13 at 4:19pm · Edited

Claire Foster Tuesday's phone banking day! 6-8pm, today's VPB code is DFDA225-1061

Alix Foster shared a link
May 16

Some of you are having problems with the links I posted. Please use this.



Phonebanking for Manka Dhingra Starts Tonight
Training Video Enclosed

MAILCHIMP

Like Share

6

Sarah Neal This is great, thank you!
Like · May 16 at 4:31pm

Rita Bosworth shared a link
April 19

Sister District Project is proud to support Manka Dhingra for Washington State Senate District 45. A win for Manka will return a true majority of the Washington State Senate to Democrats. Please like, share, follow, and donate to Manka!



I just gave to Manka Dhingra!
I just donated to @electmanka for WA45 with @SisterDistrict Let's go from #redtoblue
SECURE.ACTBLUE.COM

Like Share

25

1 Comment 17 Shares



JUN 28

Sister Race Kickoff and Volunteer Social

by Sister District OR-3

Free

[REGISTER](#)



DESCRIPTION

Sister District Turns RED States BLUE.

Manka Dhingra is a progressive Democrat running for Washington State Senate in District 45. If she wins, Democrats will have a majority in the State Senate, removing an obstacle to the progressive policies of Jay Inslee and the Democratic majority in the House. Help Manka win by joining us for a fundraiser sponsored by Sister District OR3! Food, beverages and stimulating conversation provided.

Can't make the event, but want to turn Red to Blue? ¹ CONTRIBUTE HERE: <http://bit.ly/2rWYTYw>

TAGS

DATE AND TIME

Wed, June 28, 2017
6:00 PM – 8:00 PM PDT
[Add to Calendar](#)

LOCATION

Cloudability
334 Northwest 11th Avenue
Portland, OR 97209
[View Map](#)

FRIENDS WHO ARE GOING

 [Connect to Facebook](#)