



**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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

March 15, 2019

Democratic Association of Secretary of States  
Attn: Alex Padilla, President  
PO Box 34375  
1400 L St NW Lobby 2  
Washington, DC 20005

Subject: Democratic Association of Secretary of States Complaint Return Letter with Reminder,  
PDC Case 20797

Secretary Padilla:

Below is a copy of a letter sent electronically to Glen Morgan concerning the complaint he filed with the Public Disclosure Commission (PDC) against the Democratic Association of Secretary of States. As noted below in the letter sent to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in these matters.

However, PDC staff is reminding the Democratic Association of Secretary of States about the importance of campaign finance reporting and to timely comply with the C-5 reporting requirements in the future, should additional contributions be made to candidates or political committees in Washington State using political committee funds. I have attached a copy of the C-5 report for your reference.

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

Sincerely,

Endorsed by:

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

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



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972



**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.pdcc.wa.gov](http://www.pdcc.wa.gov)**

March 15, 2019

Sent electronically to Glen Morgan

Subject: Complaint filed against Democratic Association of Secretary of States, PDC Case 20797

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2017. Your complaint alleged that the Democratic Association of Secretary of States (DASS) made a \$2,000 contribution to Tina Podlodowki, a candidate for Secretary of State in Washington State in 2016, but that DASS failed to file an Out-of-State Committee Report (C-5 report) as required in accordance with RCW 42.17A.250.

PDC staff reviewed the allegations listed in the complaint, the statutes, rules and reporting requirements, the PDC database for contribution information for DASS, and Google searches for information related to DASS. Based on staff's review, we found the following:

- On October 3, 2016, the 2016 Tina Podlodowki for Secretary of State -Vote for Tina Campaign (Campaign) timely filed a Monetary Contributions report (C-3 report) with the PDC disclosing that the Campaign received a \$2,000 monetary contribution from DASS on September 30, 2016. The Campaign timely deposited the funds into the bank account the same day, and properly attributed the contribution to the general election.
- The address listed on the C-3 report filed by the Campaign for DASS in 2016 based on the address listed on the contribution check was Charleston, West Virginia. Despite repeated attempts by PDC staff, no response was received from DASS at the email address that staff found for the Respondent.
- Staff's review found that the current mailing address for DASS is PO Box 34375, 1400 L St NW Lobby 2, Washington, DC 20005. According to information listed on its website "DASS is the leading national organization to support the election of Democratic Secretaries of States. We are a 527 Political Committee Organized to help democratic Secretaries of State."
- The Tina Podlodowski Campaign disclosed receiving \$923,443 in total monetary and in-kind contributions in 2016. The \$2,000 contribution received from DASS by Ms. Podlodowski represented less than .2 percent of total contributions received.

Based on these findings staff has determined that, in this instance, as a 527 political organization is does not appear that DASS would meet the statutory requirements as an out-of-state political committee, and thus was not required to have filed the C-5 report for the contribution. In addition, DASS's one contribution made to a candidate in Washington State does not warrant further investigation or additional staff resources to be expended.

However, PDC staff is reminding the Democratic Association of Secretary of States about the importance of campaign finance reporting and to timely comply with the C-5 reporting requirements in the future, should additional contributions be made using political committee funds.

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

Sincerely,

Endorsed by:

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

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

cc: Alex Padilla, President, Democratic Association of Secretary of States

