



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 28, 2017

Sent electronically to Glen Morgan “glenmorgan89@gmail.com”

Subject: Complaint filed against American Beverage Association PAC, PDC Case 20788

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 American Beverage Association PAC (ABA PAC) made a \$1,000 contribution to the 2016 Jay Inslee for Governor Campaign in October of 2015, but that ABA PAC failed to file an Out-of-State Committee report (C-5 report) as required in accordance with RCW 42.17A.250.

PDC staff reviewed your allegations in light of PDC laws and rules in order to determine whether a formal investigation or enforcement action is warranted. Staff reviewed: (1) your complaint; (2) the PDC database for contribution information for ABA PAC; (3) and the June 23, 2017 response from Stacey Pine, Contracts and Compliance Attorney for the American Beverage Association; and (4) communications with Phil Lloyd, Treasurer for the 2016 Jay Inslee for Governor Campaign.

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

- On November 9, 2015, the 2016 Jay Inslee for Governor Campaign (Campaign) timely filed a Monetary Contributions report (C-3 report) with the PDC disclosing that on October 9, 2015, the Campaign received a \$1,000 monetary contribution from ABA PAC.
- Mr. Lloyd stated that when the contribution information was data entered by the Inslee Campaign staff, the contributor name was inadvertently entered as ABA PAC. He confirmed that the contribution was from the American Beverage Association using association funds, and indicated that the Campaign has filed an amended C-3 report correcting the contributor name.
- Ms. Pine stated that the American Beverage Association has a political committee registered with the Federal Elections Commission (FEC), but that the funds used to make the \$1,000 contribution to the Inslee Campaign came from the American Beverage Association. Ms. Pine provided a copy of the cancelled check from the American Beverage Association for the \$1,000 contribution to the Inslee Campaign, confirming that PAC funds were not used to make the contribution.

- Ms. Pine also provided a copy of a cancelled check from the American Beverage Association for a \$2,000 contribution that was made to the Inslee Campaign on August 8, 2016, but that contribution was not listed in your complaint.

PDC staff concluded that a C-5 report was not required to have been filed by American Beverage Association, and a more formal investigation into your complaint or pursuing enforcement action in this instance is not warranted.

Therefore, PDC is returning your complaint filed against American Beverage Association without taking any action.

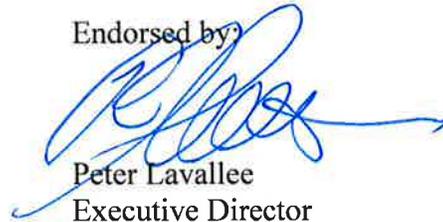
If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,



Kurt Young
PDC Compliance Officer

Endorsed by:



Peter Lavallee
Executive Director

cc: Stacey Pine, American Beverage Association



Public Disclosure Commission
Shining Light on Washington Politics Since 1972