



Political Action Committee
1050 Thomas Jefferson St., NW
Washington, DC 20007-3877

Mr. Tony Perkins
Campaign Finance Unit
Attorney General of Washington
PO Box 40100
Olympia, WA 98504-0100

Mr. Kurt Young
Public Disclosure Commission
State of Washington
711 Capitol Way #206
PO Box 40908
Olympia, WA 98504-0908

June 30, 2017

Re: Alleged violation of RCW 42.17A.250 (PDC Ticket No. 20776)

Dear Mr. Perkins and Mr. Young:

By letter dated June 14, 2017 signed by Ms. Lisa Boggess, the Attorney General's Office sought to advise Van Ness Feldman PC PAC that, on June 13, 2017, the office received a citizen action notice from a Mr. Glen Morgan alleging a violation of the Washington State campaign finance disclosure laws. That notice, included as an attachment to the letter, alleged a "major violation of RCW 42.17A" by "Van Ness Feldman PC PAC" associated with certain contributions to Jay Inslee's 2016 gubernatorial campaign. The purpose of this letter is to facilitate the investigation into Mr. Morgan's claims and demonstrate that they are entirely baseless.

Van Ness Feldman, LLP Political Action Committee (which has been the correct name of the political action committee to which Mr. Morgan appears to refer since 2012), in fact, made no contributions to Governor Inslee's 2016 campaign. As the reports filed with the Public Disclosure Commission by the Jay Inslee for Washington committee (PDC documents 100770711 and 100770713) clearly attest, the referenced contributions were not made by the Political Action Committee, but by Van Ness Feldman, LLP.¹ Similarly, the contribution checks, copies of which are enclosed, were clearly marked, "Van Ness Feldman, A Limited Liability Partnership," and were drawn from the account of that entity. Van Ness Feldman LLP is a law firm, with offices at 1050 Thomas Jefferson Street, Washington, DC 20007 and 719 Second Avenue, Suite 1150, Seattle, WA 98104.

¹ Although the reports identify Van Ness Feldman as a professional corporation (PC), Van Ness Feldman converted its legal status from a professional corporation to a limited liability partnership in October 2012, and is now known as Van Ness Feldman, LLP.

RCW 42.17A.250 imposes reporting requirements on out-of-state political committees when they make expenditures supporting or opposing Washington state candidates or political committees. Because the Van Ness Feldman, LLP Political Action Committee made no such contributions to Governor Inslee's campaign, there is no merit whatsoever to Mr. Morgan's allegations that the Van Ness Feldman, LLP Political Action Committee is an "illegally unregistered out of state political committee" and violated RCW 42.17A.250.

We respectfully request that Mr. Morgan's complaint be promptly dismissed with prejudice.

Please contact me at 202-298-1932 or jxs@vnf.com if you have any questions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jonathan D. Simon", with a long horizontal flourish extending to the right.

Jonathan D. Simon

Treasurer, Van Ness Feldman, LLP Political Action
Committee

Enclosures

VAN NESS FELDMAN
A. LIMITED LIABILITY PARTNERSHIP
1050 THOMAS JEFFERSON STREET N.W.
WASHINGTON, DC 20007-3877
(202) 298-1800

SunTrust
ACH RT 061000104
65-270-550

Check No.: 520249
Check Date 05/24/16

Check Amount
\$2,000.00

PAY TWO THOUSAND AND 00/100

TO THE
ORDER OF **JAY INSLEE FOR WASHINGTON
OFFICE OF THE GOVERNOR
416 SID SNYDER AVENUE SE
OLYMPIA, WA 98504**

[Handwritten signature]

[Handwritten signature]

Void after 180 days



VAN NESS FELDMAN
A LIMITED LIABILITY PARTNERSHIP
1050 THOMAS JEFFERSON STREET N.W.
WASHINGTON, DC 20007-3877
(202) 298-1800

SunTrust
ACH RT 061000104
85-270-550

Check No.: 520907
Check Date 08/31/16

Check Amount
\$2,000.00

PAY TWO THOUSAND AND 00/100

TO THE
ORDER OF

**JAY INSLEE FOR WASHINGTON
OFFICE OF THE GOVERNOR
416 SID SNYDER AVENUE SE
OLYMPIA, WA 98504**

Judith B...

Void after 180 days

