



State of Washington
PUBLIC DISCLOSURE COMMISSION

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August 2, 2017

Sent electronically to Glen Morgan "glenmorgan89@gmail.com"

Subject: Complaint filed against Van Ness Feldman LLP, PDC Case 20776

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2017. Your complaint alleged that Van Ness Feldman LLP made a \$2,000 contribution to the 2016 Jay Inslee for Governor Campaign in May of 2016, but that Van Ness Feldman LLP 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 Van Ness Feldman LLP; (3) the June 30, 2017, response letter from Jonathon Simon, with Van Ness Feldman LLP; 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 June 6, 2016, the 2016 Jay Inslee for Governor Campaign (Campaign) timely filed a Monetary Contributions report (C-3 report) with the PDC disclosing that on May 27, 2016, the Campaign received a \$2,000 monetary contribution from Van Ness Feldman PAC.
- Mr. Lloyd stated that when the contribution was data entered by Inslee Campaign staff, the word PAC was inadvertently added to the end of the Van Ness Feldman contribution. He confirmed that the contribution was made by Van Ness Feldman using corporate funds, and that the Campaign has filed an amended C-3 report removing the word PAC from the Van Ness Feldman contribution.
- In the June 30, 2017 response letter, Mr. Simon stated that Van Ness Feldman LLP is a limited liability partnership and that the contribution was made to the Jay Inslee for Governor Campaign out of Van Ness Feldman LLP's partnership account. He stated that Van Ness Feldman LLP does have a political action committee, but those funds were not used to make the contribution.

PDC staff concluded that a C-5 report was not required to have been filed by Van Ness Feldman LLP, 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 the Van Ness Feldman LLP 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: Jonathon Simon, with Van Ness Feldman LLP