

June 7th, 2017

Public Disclosure Commission
711 Capitol Way #206
PO BOX 40908
Olympia, WA 98504-0908
pdcc@pdcc.wa.gov

Re: Alleged violations of RCW 42.17A

To Whom It May Concern:

I write in response to Mr. Glen Morgan's recent complaint concerning my 2017 campaign for State Senate in the 45th Legislative District.

I appreciate the opportunity to respond to these false allegations. Mr. Morgan's complaint consists of several inaccuracies and unfounded assumptions. Below are my responses to Mr. Morgan's erroneous complaints.

1. Concerning campaign books inspection location

The campaign is in compliance with both RCWs and the WAC cited by Mr. Morgan. The campaign can and will make its books available for inspection when required under the appropriate statute. Regardless of the current location, which is absolutely reasonable and convenient, we will be amending the C-1 since we now have a principal headquarters.

2. Concerning accuracy on C3 reports

a. This was a simple scrivener's error that was not noticed until the date of the amendment. When the error was brought to our attention, the report was amended immediately. Innocent errors occur in daily life, and amending reports to correct the record increases transparency and should not be penalized. Furthermore, no one viewing the C3 would have any misunderstanding of where the funds came from.

b. Mimi Stewart reported her employer as "MS." and we have no reason to doubt the accuracy of her reporting, but if the PDC wishes us to reconfirm with Ms. Stewart, we are more than willing to do so.

c. This is a completely baseless accusation which when taken in the totality of the behavior of Mr. Morgan is raising some very serious concerns regarding the intent of Mr. Morgan and the conduct that he is engaging in. He is actively impeding in the ability of the campaign to run. This charge is nonspecific, and I have not yet developed the ability to respond to a figment of Mr. Morgan's imagination.

3. Concerning in-kind contributions

a. After earlier consultation with the PDC, this is now accurately reported as a debt that

we have since paid. Copy of the check to Megan Bishop for \$20, and a bank statement showing that the check has cleared is available upon request.

b. According to the PDC interpretations of the rules on campaign loans, “a receipt for out-of-pocket expenditures may be used for the loan agreement, provided it contains the date the expenditure was made, the amount to be repaid, and is signed by the campaign treasurer and person expecting repayment.” We have receipts for all of these reimbursements, available upon request.

4. Concerning sponsor identification on online political advertisements

My campaign does not pay Facebook to have a Facebook Page. The service is free, and thus is not “paid for” by the campaign. However, even though the PDC does not require it, given the persistent, incessant, baseless behavior of Mr. Morgan my campaign has now amended the absolutely free Facebook page to show that it is “paid for” by my campaign. The campaign has not bought any Facebook advertisements. Again, I have no idea what the basis of Mr. Morgan’s complaint is.

**5. Concerning reporting of in-kind contributions, debts and obligations, and pledges
In-kind Contributions**

a. Every political office is different and even two campaigns for the same office will be different. One initial quote that works for one campaign may not be the one agreed upon in the end, nor may it work for another campaign entirely. There are many variables to take into account: a different voter base, different contribution limits, different laws governing the elections, different duties and requirements, etc. In the email exchange Mr. Morgan refers to, our treasurer’s quote is an initial one for a Seattle City Council campaign. The population of Washington State District 45 is around 130,000. The population of the City of Seattle is nearly 700,000. City campaigns are part of the city’s Democracy Voucher program and require additional work to process. State Senate races are not. The SEEC also has a variety of additional requirements that the PDC does not. All of this will contribute to a difference in compensation for the same job title in two different campaigns for two different offices. We believe our rate with our treasurer is well within the average for a campaign treasurer performing the tasks assigned to him on a campaign of our size and scope. For Mr. Morgan to create a fake email address and request a fake quote from my treasurer to file a misinformed claim with the sole purpose to intimidate, harass and create more work for my campaign thereby disrupting the work of the campaign is extremely concerning and needs to stop.

b. My husband paid for the consumables from Costco out-of-pocket using community property funds and was reimbursed for it by my campaign on April 7th. All relevant information is in our publicly available C-4 reports, and the receipt is available upon request.

What is extremely concerning, is the fact that Mr. Morgan created a fake email address, pretended to be a teenage girl, and reached out to a teenage boy who is volunteering on my campaign to get information. Mr. Morgan is well aware that I have a teen campaign committee and for him to stoop to this level is unconscionable and creates great concern

to me about the safety and welfare of the teens who are trying to engage in political discourse and working for a candidate they believe in. Mr. Morgan then persisted and contacted my campaign using the same fake identification to elicit information a second time. He then provided a fake phone number when asked for information. He then contacted the campaign a third time. Given that this is Mr. Morgan's 4th PDC complaint against me and the first 3 have been determined not to be founded in fact or law, Mr. Morgan's behavior is escalating at an alarming rate. Given my work with the Prosecutor's office and mental health court, I have serious concerns about what this escalation will lead to. I urge the PDC and the Attorney General's Office to show the same level of concern and outrage about Mr. Morgan's behavior—which is, at best, intimidating and threatening, and, at worst, is potentially unlawful—especially in his targeting of the teen campaign. If necessary, we will take any and all legal recourse available to us to protect our volunteers.

c. This was not an in-kind contribution, as stated previously in section 3a. It is a debt that we have since paid.

d. Mr. Morgan is reading the reports incorrectly. This was an in-kind loan, not a contribution, that has since been repaid. The date is correct, as this is the date that I made this loan to my campaign.

Debts and Obligations

a. Mr. Morgan has included these charges in previously adjudicated complaints and the matter has been resolved. We still believe that his interpretation of state law is incorrect and we have the letter from the Attorney General's Office confirming this. Mr. Morgan needs to cease and desist his harassing conduct. The codes cited here are concerning contingent liabilities and campaign debts and obligations. We do not have any contingent liabilities with any of our vendors, thus none are reported, and we believe we are reporting all debts and obligations correctly. As stated in a previous response to Mr. Morgan's complaints, the amounts are accurate insofar as the debt owed to these vendors at the end of the month is not the same as it will be at any future date. If the campaign no longer sought the services of this vendor at the end of the month, this is the amount that would be owed. Based on our reading of the law and our consultations with the PDC and SEEC, we believe it would be incorrect to report future obligations that have not yet occurred.

b. This debt is on our C-4 report for February.

Pledges

While I would love to get a pledge from the WSDC as well as all of the entities listed by Mr. Morgan, he clearly has information that I do not possess. All pledges, endorsements and contributions are reported according to the rules laid out. Again, I am not in a position to respond to figments of Mr. Morgan's imagination.

Miscellaneous

With respect to Mr. Morgan's "example" of the Old Redmond Schoolhouse Community

Center, the date was thought to be accurate when it was reported. The report will be amended to correct the record.

However, Mr. Morgan's vague assertions based on nothing more than his "belief" that our campaign has "systematically misreported the date for multiple contributions" and other reportable items is nothing more than unsubstantiated speculation.

6. Concerning the certification of contribution and expenditure reports

While an electronic signature is automatically generated by all software used to file reports with the PDC, this is no indication that the reports are not properly certified. I review and certify every report as required by state law.

7. Concerning our campaign records

Mr. Morgan, again, in an attempt to harass and intimidate, has made purely unfounded allegations in an effort to try to cause us to have to provide documents under threat of a subpoena. We do not know why Mr. Morgan has reason to believe my campaign does not maintain certain records. Our campaign believes in transparency, but again I am not in a position to respond to figments of Mr. Morgan's imagination. There is no legal basis for a subpoena, as we have not engaged in any behavior that violates the law with respect to our campaign documents.

8. Concerning the declaration of committee officers

While I receive advice from my committee about the direction of the campaign, I alone make the decisions. If that should change, we will amend the C-1 report to reflect that. Again, I refer to my inability to respond to Mr. Morgan's imagination.

9. Concerning unauthorized expenditures

I authorize all expenditures made by my committee. If that should change, we will amend the C-1 report to reflect that.

10. Concerning the disclosure of income on F-1 report

NAMI Eastside has not received a singular government agency grant in excess of \$12,000. This is once again a baseless and incorrect allegation by Mr. Morgan.

11. Concerning the disclosure of assets on F-1 report

According to the PDC instructions, I don't need to itemize stocks in investments that I don't make individual buy/sell decisions on.

Finally, with respect to Mr. Morgan's utterly unfounded claim that any of the above actions, if found to be violations of the law—which we again assert is *not* the case—were done with malice as contemplated by RCW 42.17A.750(2)(c): there has been *absolutely no* malicious action undertaken by myself or those working with my campaign. Alleging "beliefs" that violations have been committed—with the serious multiplier of allegations of malice—do not amount to sufficient grounds for the level of inquiry that Mr. Morgan is seeking.

Thank you again for the opportunity to address these allegations. I have conducted my campaign business with complete transparency and integrity. I am happy to provide any additional information you may need and answer any further questions. Please feel free to contact me.

Sincerely,

Manka Dhingra