



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)

December 17, 2018

Delivered electronically to Dana Ralph

Subject: Complaints regarding Dana Ralph #1 & #2, PDC Cases 14848 & 14921

Dear Ms. Ralph:

Below is a copy of an electronic letter sent to Glen Morgan concerning the two complaints he filed with the Public Disclosure Commission (PDC) against you. As noted below in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action.

Based on PDC staff's review, the PDC has dismissed the allegations listed in PDC Case 14848 and PDC Case 14921 in accordance with RCW 42.17A.755(1).

If you have questions, please contact Kurt Young at (360) 664-8854, toll-free at 1-877-601-2828, or by email at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by:

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

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





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December 17, 2018

Delivered electronically to “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaints regarding Dana Ralph, PDC Case 14848 & 14921

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the two complaints you filed against Dana Ralph, a 2015 candidate for City Councilmember for the City of Kent and a 2017 candidate for the Mayor of Kent, may have violated RCW 42.17A by failing to timely file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities,

PDC staff reviewed the allegations listed in the two complaints you filed, the statutes, rules and reporting requirements, queried the PDC contribution and expenditure database for Dana Ralph, reviewed the Candidate Registrations (C-1 reports), C-3 and C-4 reports filed by the Committee to Elect Dana Ralph (Campaign), and the responses to the complaint provided by Ms. Ralph. As a result of staff's review, we found the following:

- On March 9, 2016, Ms. Ralph filed a C-1 report declaring her candidacy for election to office of Mayor for the City of Kent in 2017, selecting the Full Reporting Option and listing Doug Scharnhorst as the Campaign Treasurer.
- On July 7, 2015, Ms. Ralph filed a C-1 report declaring her candidacy for re-election to the Kent City Council, selecting the Full Reporting Option and listing Barbara Frazier as the Campaign Treasurer. Ms. Ralph was re-elected to the Kent City Council in 2015, after being elected to the Kent City Council in 2011.
- On January 4, 2016, the 2015 Campaign timely filed a C-4 report for December of 2015 disclosing \$11,080 in total contributions had been received, and \$1,572 in total expenditures made, with the \$9,508 in remaining funds classified as surplus funds.
- Ms. Ralph stated that the 2015 Campaign disclosed receiving a \$105 in-kind contribution from Ron Harmon on March 30, 2015. The complaint alleged that the activity was reported late on April 20, 2015, but that information was disclosed on an amended C-4 report that was initially timely filed on April 1, 2015, 10 days early, and included as an amendment once the Campaign became aware of it.

- Ms. Ralph stated she is not Dana Stober, is not related to Bailey Stober, and that Mr. Stober did not provide any consulting services to her 2015 or 2017 Campaigns, thus he was not authorized to make expenditures. She acknowledged that Ms. Frazier had been her Treasurer for her 2011 City Council race and was initially listed on the 2015 C-1 as Treasurer, but Doug Scharnhorst was listed as the Treasurer on the C-3 and C-4 reports filed by the 2015 Campaign. Mr. Scharnhorst was listed as the official Treasurer for the 2017 Mayoral Campaign.
- The 2017 Mayoral Campaign disclosed receiving \$90,737 in monetary and in-kind contributions, and made expenditures totaling \$84,255.
- Staff's review found that during the period April 1, 2016 through May 31, 2017, the Campaign timely filed C-3 and C-4 reports, and in most instances, before the required filing date. In addition, the Campaign timely filed the 21-Day and 7-Day Pre-Primary Election C-4 reports, the Post-Primary Election C-4 report, and the 21-Day and 7-Day Pre-General Election C-4 reports, and the Post-General Election C-4 report
- Ms. Ralph stated her 2017 Campaign contacted the contributors identified as having contributed to her 2015 surplus funds and requested their permission to use the contribution for her 2017 Mayoral campaign in accordance with PDC laws and rules. She stated the April 2016 \$100 transfer of surplus funds with permission was less than \$200, and that monthly C-4 reports are not required to be filed if there is less than \$200 of contribution or expenditure activity within the reporting period.
- On November 29, 2016, the Campaign timely filed a C-3 report disclosing that on November 28, 2016, the Mayoral "Transferred from Council Race with permission" \$6,415. Ms. Ralph stated that the Campaign has "written permission from all donors to transfer the funds to the Mayoral campaign. Heritage Bank is listed on the reports as it was an electronic funds transfer completed by Heritage Bank. The description clearly shows "transfer to mayoral campaign with permission".
- Ms. Ralph stated that the 2015 and 2017 Campaigns had separate accounts, and that the allegations concerning exceeding contribution limits were both transfers of surplus funds with permission from her 2015 City council campaign. The contributors who granted permission to transfer their surplus funds, were not subject to contribution limits for the Mayoral race. In addition, the allegation that the 2015 Campaign exceeded contribution limits to the 2017 Mayoral Campaign is not a violation since the funds transferred were 2015 surplus funds, and not subject to contribution limits.
- On September 6, 2016, the 2017 Campaign timely filed a C-4 report for August of 2016, disclosing an \$86 expenditure made to Ms. Ralph and listing the description as "post office box." Ms. Ralph stated that PO Box 6042 is the 2017 Campaign post office box, and that box has only been used for campaign purposes since 2008.
- Ms. Ralph stated that the website referenced in the complaint "was not and did not represent itself as a campaign website. It was only active during the time I was serving as council president for the sole purpose of sharing with the community. There was no campaign activity conducted on this website." She stated the costs for the website were not disclosed as an expenditure or contribution since "it would not be appropriate to use campaign funds to pay for a website not related to the campaign." She added there was no in-kind contribution for either photography or any website domain costs since it was not a campaign related website.

- Ms. Ralph stated that she did not use City of Kent public resources to support her candidacy, and that the “video in question was not produced as a part of any campaign.” She stated the City of Kent began producing a series called “Calling Kent Home” more than five years ago, that includes 13 videos of city elected officials (including herself) and local residents. She stated her video, as well as the others in the series, were” not produced nor used as any type of campaign. There is no in-kind amount to be reported as the series was totally unrelated to any campaign or was it shared in any campaign materials.”

PDC staff found no evidence of a material violation that would require conducting a more formal investigation into your two complaints or pursuing enforcement action in this instance. Based on this information, PDC staff is dismissing these two matters, PDC Cases 14848 & 14921, 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  
PDC Compliance Officer

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

cc: Dana Ralph

