



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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April 26, 2017

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

Subject: Complaints #1 and #2 filed against Manka Dhingra: PDC Case No. 14130

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on February 14 and February 18, 2017 respectively. Your complaints alleged that Manka Dhingra, a first-time candidate seeking the office of State Senator from the 45th legislative District in 2017, violated RCW 42.17A on multiple occasions, as detailed below.

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 your complaint, the PDC contribution and expenditure database for Manka Dhingra, Candidate Registrations (C-1 report), Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), filed by the Friends of Manka Campaign, and the response letter from Ms. Dhingra. Based on staff's review, we found the following:

**Allegation: Failure to timely file C-3 and C-4 reports.**

The complaint alleged that the Friends of Manka Campaign (Campaign) failed to timely file a C-4 report which was required to have been filed on the same date as the C-1 report if any contribution or expenditure activities had been incurred prior to the date filed. In addition, the complaint alleged that the Campaign failed to timely file C-3 reports disclosing contributions received. Staff's review of this allegation found:

- On February 17, 2017, the Campaign filed five C-3 reports totaling \$40,375 disclosing monetary contributions that had been received by the Campaign between February 3-9, 2017, and timely deposited into the Campaign bank account between February 3-13, 2017.
- On February 17, 2017, the Campaign filed a C-4 reports covering the period February 3 through 16, 2017, disclosing that the Campaign received \$40,375 in monetary contributions for the five bank deposits referenced above, made three expenditures to Anedot, an on-line fundraising vendor, totaling \$1,111 for "merchant services", and had one \$960 outstanding debt owed to NGP Van for database services.

While the initial C-3 and C-4 reports were filed four days late, the Campaign's lack of timeliness in their filings was due to PDC staff's delay in issuing the Campaign a filer identification number for newly registered candidates. There is a short timeframe from when a candidate files a C-1 report with the PDC, and when the Campaign had the ability to file its C-3 and C-4 reports electronically using the Online Reporting of Campaign Activities (ORCA).

The C-3 and C-4 reports appear to have been filed by the Campaign as soon as the necessary filer identification number was provided allowing the Treasurer to upload the reports.

**Allegation: Failed to timely file the C-1 report.**

The complaint alleged Ms. Dhingra failed to timely file the C-1 report, and that she should have filed the C-1 report by January 23, 2017, based on the fact the domain name had been purchased on January 9, 2017.

On February 13, 2017, Manka Dhingra filed a C-1 report declaring her candidacy for State Senator from the 45<sup>th</sup> Legislative District in 2017, and selecting the Full Reporting option. She stated that she made the decision to seek the office of State Senator on January 31, 2017, and that *"Prior to that date, I did not accept a contribution or spend money for a campaign; reserve space or purchase advertising to promote my candidacy; authorize someone else to do any of these activities for me; state publicly that I am seeking office; or file a declaration of candidacy."*

While the web domain name was purchased on January 9, 2017, there is no evidence that she used the web domain for a campaign purpose prior to January 31, 2017.

**Allegation: Failed to timely file a Personal Financial Affairs Statement (F-1 report).**

The Complaint alleged Ms. Dhingra failed to timely file the F-1 report, and that the F-1 report was due by January 23, 2017, based on the date the domain name was purchased. On February 22, 2017, Manka Dhingra filed an F-1 report declaring her candidacy for State Senator from the 45<sup>th</sup> Legislative District in 2017. As noted above concerning the C-1 report, Ms. Dhingra reserved the domain name prior to filing her F-1 report, and she did not make a decision to officially run for office until January 31, 2017. at that time.

Based on a January 31, 2017, Ms. Dhingra's announcement date, the F-1 report was due to be filed within two weeks or not later than February 13, 2017. The F-1 report was filed by Ms. Dhingra nine days late.

**Allegation: Failed to timely disclose contributions, expenditures or obligations and debts owed to vendors**

The Complaint alleged that the Campaign failed to timely disclose obligations and debts for the website, the website domain registration, and professional photography based on the complainant's review of the Dhingra campaign website and Facebook page.

The February 17, 2017, C-4 report filed by the Campaign disclosed a \$960 outstanding debt on the Schedule B to C-4 report owed to NGP Van for database services, and the March 10, 2017, C-4 report filed by the Campaign disclosed a \$600 obligation owed to Brian Dalbalcon Photography.

The Campaign disclosed a \$59.40 debt dated February 11, 2017, as an in-kind contribution loan from the candidate on an amended February 2017 C-4 report filed on March 23, 2017. The in-kind contribution loan was disclosed two weeks late, but is far ahead of the date of the 2017 primary or general elections and a very small amount compared to overall campaign activities to date.

PDC staff would note that Ms. Dhingra is a first-time candidate for public office and the incidental late filings of the F-1, C-1, C-3 and C-4 reports by the Campaign, were filed almost three months prior to Candidate Filing week, and more than five months before the 2017 primary election.

PDC staff found no evidence of a material violation that would require conducting a more formal investigation into your complaints or pursuing enforcement action in this instance, as noted in the Attorney General's letter to you. Therefore, PDC is returning your complaints filed against Manka Dhingra 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](mailto:kurt.young@pdc.wa.gov).

Sincerely,

  
Kurt Young  
PDC Compliance Officer

Endorsed by:

  
Evelyn Fielding Lopez  
Executive Director

cc: Manka Dhingra



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972