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Delivered via electronic mail

April 3, 2017

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Kevin Ranker
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RE: Citizen Action Notice: Kevin Ranker
Notice of Results

Dear Mr. Morgan and Sen. Ranker:

I am writing to advise you of the decision of the Attorney General's Office regarding the citizen action notice submitted against Sen. Ranker by Mr. Morgan. The notice makes multiple allegations against Sen. Ranker and his campaign concerning alleged violations of the state campaign finance and disclosure laws.

The Attorney General's Office reviewed the allegations, Sen. Ranker's response, and filings with the Public Disclosure Commission. The review revealed the following:

1. The campaign accounted for the travel attributed to Sen. Ranker and appears reasonable in light of the district in which the campaign was run.
2. All but one campaign expense were sufficiently identified and accounted for. The only expense for which more detail may have been needed (September 26, 2013 to Tif & Gif) falls outside the limitations period for a citizen suit in RCW 42.17A.765.
3. Regarding campaign debt, expenses were appropriately identified as debt. The other expenses either did not involve debt, or the debt did not cross the reporting threshold.

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4. The campaign consultant did not have the requisite decision-making authority to require listing as an officer.
5. A review of contributions prior to the primary appear to have been timely reported.
6. A single contribution disclosed late was attributed to a change in treasurer and was rectified more than a year before the general election.
7. The campaign received and paid for staff services to the Senate Democratic Campaign Committee. This was not a contribution to a caucus committee.
8. Regarding surplus funds expenditures, the campaign treasurer used the wrong credit card for payments. The surplus funds account was reimbursed once the error was discovered.

The sole remaining issue involves the payment of the candidate filing fee. Sen. Ranker paid that fee himself. This missing information appears to be a miscommunication between Sen. Ranker and his committee. This single issue is insufficient to warrant superior court action to address. As such and given the fact that Mr. Morgan previously filed a complaint with the Public Disclosure Commission on this issue, the Attorney General's Office is exercising its prosecutorial discretion to leave this matter to the Public Disclosure Commission to address as it deems appropriate under its rules.

For the reasons given above, the Attorney General's Office does not intend to bring a judicial enforcement action for the allegations in the Morgan notice. Our office's decision is based upon the facts addressed in your notice, and this letter does not express an opinion as to the application of campaign finance and disclosure laws except to the specific situation at issue in this letter. This brings to a completion the State's review and action. If there are any questions, please contact the undersigned.

Sincerely,



LINDA A. DALTON

Senior Assistant Attorney General

LAD:kj

cc: Darwin Roberts, Deputy Attorney General (w/o enclosure)
Randall Gaylord, San Juan County Prosecutor (w/o enclosure)
Elizabeth Petrich, Thurston County Prosecuting Attorney's Office (w/o enclosure)
Evelyn Fielding Lopez, Public Disclosure Commission (w/o enclosure)