



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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April 5, 2017

Senator Kevin Ranker

Sent electronically to Senator Ranker "kevin@kevinranker.com"

Subject: Complaint filed by Glen Morgan; PDC Case 12170  
Complaint Return Cover Letter with Filing Reminder

Dear Senator Ranker:

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) on January 26, 2016. The complaint alleged that there were multiple violations of state campaign finance and disclosure laws (RCW 42.17A) during your 2016 campaign for reelection as State Senator for the 40<sup>th</sup> Legislative District.

As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter. PDC staff is reminding you about the importance of the timely disclosure of all contribution and expenditure activities, including the candidate filing fee for any future election campaign.

If you have questions, please 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,

Evelyn Fielding Lopez  
Executive Director



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



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April 5, 2017

Glen Morgan

Sent via email: [glenmorgan89@gmail.com](mailto:glenmorgan89@gmail.com)

Subject: Complaint filed against Representative Kevin Ranker  
PDC Case No. 12710

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on January 26, 2017. Your complaint alleged that Kevin Ranker, an incumbent State Senator from the 40th Legislative District and a candidate seeking re-election to that office in 2016, violated RCW 42.17A on multiple occasions.

The complaint alleged that the Citizens for Kevin Ranker Campaign: (1) failed to timely report in-kind contributions for the candidate filing fee and for professional photography; (2) made prohibited expenditures using campaign funds; (3) failed to break down expenditures, including providing an accurate description for expenditures and failing to disclose debts and obligations for those expenditures; (4) failed to list a campaign consultant as a committee officer; (5) failed to accurately file C-3 reports; and (6) made unauthorized expenditures using surplus funds.

PDC staff reviewed your allegations in light of PDC laws and rules in order to determine whether a formal investigation or enforcement action would be warranted. Staff reviewed your complaint, the PDC contribution and expenditure database for Senator Ranker and the Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Citizens for Kevin Ranker (Campaign), and the response letter from Senator Ranker. Based on staff's review, we found that:

- Senator Ranker was elected State Senator in 2008, and re-elected to that office in 2012. Prior to that, Senator Ranker served one term as a San Juan County Commissioner.
- On February 11, 2013, Senator Ranker filed a Candidate Registration (C-1 report) declaring his candidacy for re-election to State Senator from the 40<sup>th</sup> Legislative District in 2016, and selecting the Full Reporting option. He was re-elected on November 8, 2016.
- Senator Ranker stated that the 40th legislative district includes many residents who live in and around the San Juan islands, which required both him and his campaign to incur a lot of travel-related expenses to adequately campaign and communicate with voters.

- The expenditures reimbursing Senator Ranker and Clare Spatola-Knoll, were for campaign related travel which is a permissible purpose since they were directly related to the Campaign. As noted in the Attorney General's Office letter sent to you, those Campaign expenditures appeared to be "reasonable in light of the district in which the campaign was run."
- Concerning unreported campaign debt, the \$6,000 expenditure made to Strategies 360 on December 5, 2016 was not contractually obligated, but instead was as unexpected invoice that was sent to the Campaign after the election on December 2, 2016. The invoice was related to prior work Strategies 360 had undertaken concerning the campaign website, and Senator Ranker stated that after some discussions and negotiations with Strategies 360, the Campaign agreed to pay to pay the invoice.
- The other allegations concerning campaign expenditures that should have been reported as debt, were for expenses occurred on an ongoing or monthly basis, such as salaries, rent for office, and other recurring fees that are not reportable as campaign debt.
- Strategies 360 was a vendor that was hired by the Campaign to re-design the campaign website. Strategies 360 was not an officer of the Campaign or a principal-decision maker, and did not have the required "decision-making authority" necessary to be disclosed on the C-1pc report as an officer.
- The Campaign timely filed C-3 reports disclosing monetary contributions received, including contributions that were received prior to the August 2016 primary election being held. Staff did note that the Campaign failed to timely disclose a \$950 contribution received from the Lummi Commercial Company on September 4, 2015. However, that late filing was mitigated by a change in Campaign treasurers, and the fact the contribution was disclosed more than a year before the 2016 general election, and only 31 days late.
- Concerning the Last Minute Contributions report (LMC report) allegation, the 2016 Pre-Primary LMC reports were required to have been filed for contributions received between July 26, 2016 and August 1, 2016. Senator Ranker stated the contributions were received by the Campaign on August 2, 2016, the date of the primary election, and "outside of the LMC reporting window." In addition, the contributions received by the Campaign from Microsoft and Pfizer were less than \$1,000, and not subject to the LMC reporting requirements.
- The Campaign contracted with the Senate Democratic Campaign Committee SDCC for staff services, and paid the SDCC the "fair market value" for that service, so there was no contribution made.
- The allegation concerning the surplus funds expenditures, was due to the campaign treasurer using the wrong credit card to make the expenditures, and the Campaign reimbursed the surplus funds account once the error had been discovered.

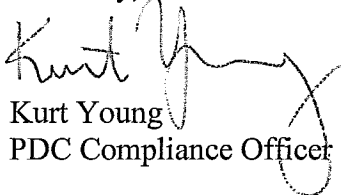
- The last remaining allegation involved the failure to timely disclosed the payment of the 2016 candidate filing fee. Senator Ranker noted that he paid the filing fee himself using his personal funds, and that should have been timely reported by the Campaign as an in-kind contribution. The \$455 filing fee was disclosed as an in-kind contribution after the November 8, 2016 election, and the late filing was due to a miscommunication between Senator Ranker and his Campaign.

PDC staff concluded that a more formal investigation into your complaint or pursuing enforcement action in this instance is not warranted. While the filing fee was disclosed after the election on an amended C-4 report, it was clear that the filing fee had been paid since Senator Ranker's name appeared in the Voter's Pamphlet and on the ballot. In addition, the \$454 in-kind contribution that Senator Ranker paid for the filing fee, represented .3% of total contributions received for the entire Campaign.

PDC staff is reminding Senator Ranker about the importance of the timely disclosure of all contribution and expenditure activities, including the candidate filing fee for any future election campaign.

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

cc: Kevin Ranker

Endorsed by:

  
Evelyn Fielding Lopez  
Executive Director

1900

Received of the Treasurer of the  
Board of Directors of the  
City of New York  
the sum of \$100.00  
for the year 1900

Witness my hand and seal  
this 1st day of January  
1901

Mayor of the City of New York

John A. B. [Signature]

John A. B. [Signature]

John A. B. [Signature]

John A. B. [Signature]