



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Campaign Finance Unit

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March 29, 2017

Glen Morgan
1001 Cooper Point Road SW #140-222
Olympia, WA 98502
Glenmorgan89@gmail.com

RE: Citizen Action Notice – Jim Cooper (2)
Notice of Results

Dear Mr. Morgan:

I am writing to advise you of the decision of the Attorney General's Office regarding your citizen action notice identified above. You allege that Jim Cooper and his campaign violated state campaign finance and disclosure laws by: 1) producing two Facebook videos that lacked sponsor identification; 2) failing to accurately report expenditures or in-kind donations related to the two Facebook videos; and 3) failing to include sponsor identification on the campaign's webpage. Our office has reviewed documents and statements Mr. Cooper provided to us, filings and responses Mr. Cooper provided to the staff of the Public Disclosure Commission in response to your notice, Mr. Cooper's website, and applicable laws.

Our investigation revealed that the videos in question feature visual and spoken identification of Mr. Cooper, the office he sought, and his party preference. Mr. Cooper appears personally throughout both videos. Although the videos do not explicitly state Mr. Cooper or his committee were the "sponsors," a reasonable viewer would be left with the impression that he or his committee had sponsored the videos. Mr. Cooper states that he produced the videos himself as an amateur filmmaker, and therefore no expenditure or in-kind contribution was reportable for producing the videos.

Finally, Mr. Cooper's campaign website did include his campaign mailing address, on the "Donate" page of the website. *See* Donate Page, <http://www.electjimcooper.com/donate> (publicly visible from approximately January 29, 2014 until December 2016). The same website repeatedly identifies itself as supporting the election of Mr. Cooper to the Thurston County Board of Commissioners and solicits contributions for Friends of Jim Cooper. A reasonable viewer would conclude that, based upon the endorsements throughout the website and Mr. Cooper's likeness, he and Friends of Jim Cooper were the website sponsors.

For the reasons given above, the Attorney General's Office does not intend to bring a judicial enforcement action against the Respondents for the allegations in your notice. Our office's

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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 on your notice. I would also note that you have filed three more recent citizen action notices alleging violations of state law against Mr. Cooper and his committee, and the State will respond separately to those notices. If you have any questions, you may contact counsel for the State.

Sincerely,



WALTER M. SMITH

Assistant Attorney General

WMS:kj

cc: Darwin Roberts, Deputy Attorney General
Elizabeth Petrich, Thurston County Prosecuting Attorney's Office
Evelyn Fielding Lopez, Public Disclosure Commission
John Kesler, Counsel for Respondents