

**Glenmorgan89** replied a month ago (Tue, 8 Nov at 7:45 AM)  
to : pdc@pdc.wa.gov

**Jacob,**

**I wanted to thank you for correcting the original error in sending me the incorrect complaint, and I appreciate the correct complaint attached on the second try. I know this is a busy time for your office.**

**I write in response to the PDC complaint lodged against me by Kevin Hamilton (#9379) on behalf of the Washington State Democratic Central Committee.**

**First let me state that I broke no law or rule when I put out my robocalls this year. I followed the law scrupulously.**

**I have followed RCW 42.17A.442. I am sorry that Mr. Hamilton was not patient enough to wait for the next month's reporting, but We want to be Friends of Jimmy Too PAC most certainly has more than ten donors. In fact, it has 11 local donors, as Mr. Hamilton is well aware.**

**As to the allegations about the "two-committee structure" Mr. Hamilton says I used, I feel it is important to note that many of the labor organizations he has represented over the years use the exact same structure as they move money from PAC to PAC.**

**No one is accusing those committees of obfuscating their donors and for good reason; because, like Friends of Jimmy PAC and We Want to be Friends of Jimmy Too PAC, those organizations like SEIU 925, SEIU 775, and others report the existence of their committees as they move their dues donations from the official union PACs to other PACs like COPE, and to other PACs who carry out their electioneering communications on the ground and to the public. These disclosures are exactly how Mr. Hamilton located myself and all of his evidence, so the notion that I am obfuscating anything is grandstanding at best.**

**Secondly, there is another good reason to move funds in this manner between PACs, and this is to reduce the workload both for myself and the Public Disclosure Commission in dealing with frivolous complaints. As Mr. Hamilton is well aware, when making Robocalls, the disclosure of the PAC identification and the top 5 contributors to that PAC is required during the Robocall. Since donations were trickling into We Want to Be Friends of Jimmy Too from various local donors throughout the campaign, and because the donation amounts were modest, the top 5 contributors list had the potential to change frequently, which would then require frequent changes in the Robocall messages, which would lead to further confusion on the part of Mr. Hamilton, the Washington State Democratic Party, or JZ Knight (Ramtha) or even the PDC at various times. To ensure that this violation could not possibly be made inadvertently or even have the appearance of being made, the two committee structure and transfer is most logical. This is also a fact that Mr. Hamilton knows from his other clients.**

**I did not violate RCW 42.17A.335 either. I put the number of the Thurston County Democrats in the Caller ID because I wanted the recipients of my robocalls to call and verify the allegations I was making. This was a courtesy to them. It only seemed fair and logical that the Thurston County Democrats have an opportunity to respond to these statements of fact. I expressed this intent in most Robocalls for voters to call and verify**

**the statements for themselves. I am sorry I did not state this expressly in the first robocall, but there is only so much time to be had and it was important that we get the whole message and the by-line in the robocall. That by-line was designed to be in compliance specifically with WAC 390-18-010, and no one, not even a judge, has pointed to a rule that I broke. No one, not even a judge, has found that I acted with actual malice because I did not. I act as a journalist reporting on this year's election, and reporting on the information I disseminated in various articles I had written about this candidate previously in the year. I did not "manipulate" the caller ID technology. I used it as a tool to verify allegations on matters of public concern, and only those who do harm to the voters could call that malice. It was also the only effective method we could find to communicate with large groups of voters who had no other way to receive this information. I will point out to Mr. Hamilton that after the Robocalls were made, the Olympian (a local newspaper) followed up on these facts we pointed out in our article and the candidate has refused to address them, and has indicated he "can't discuss them" because they are true. They might be inconvenient for the candidate who attempted to hide them from the public and the media, but they are factually true. Were it not for our Robocalls, these facts would not have been reported in the newspaper either.**

**Most political parties spend large sums of money attempting to advertise and convince people to contact them or speak to them. Voter outreach is an important part of their existence. It would be bizarre, indeed, if not unique in the annals of politics for a political party to complain that they received too many phone calls from local voters. In fact, I provided this service to the Thurston County Democrats and the Washington State Democrats free to them, and there may be an argument to be made that I should have reported this as an in-kind donation to them.**

**I deny all of the allegations against me in the WSDCC complaint filed with the PDC by Mr. Hamilton. I will continue the full disclosure I have always conducted in my business with the Washington State Public Disclosure Commission.**

**Best regards,**

**Glen Morgan  
Friends of Jimmy PAC  
We Want to Be Friends of Jimmy Too PAC  
(360) 791-6556**