

September 7th, 2017

Public Disclosure Commission  
711 Capitol Way #206  
P.O. Box 40908  
Olympia, WA 98504-0908

To Whom It May Concern:

I write in response to Mr. Glen Morgan's eighth complaint concerning my 2017 campaign for State Senate in the 45th Legislative District, and I appreciate the opportunity to respond to Mr. Morgan's erroneous claims against my campaign, point by point. They are as follows:

**1) Concerning campaign expenditures**

In his complaint Mr. Morgan failed to cite WAC 390-16-238(2) which notes, "an expenditure of a candidate's campaign funds shall be considered personal use if it fulfills or pays for any commitment, obligation or expense that would exist irrespective of the candidate's election campaign." By this definition the expenditure on gas cards is not considered a "personal use" since it would not exist "irrespective of my campaign." These gas cards were purchased in \$50 increments and handed out to our most committed interns and field organizers to recognize all the hard work and effort they put in each month (six cards for the June expenditure and ten cards for the July expenditure). We are happy to produce the receipts for this expenditure upon the commission's request. The regulations listed in WAC 390-16-238(3) only apply if the "expenditure is both personal and campaign related." This expense would not exist irrespective of my campaign and is exclusively campaign related. Lastly, with regards to Mr. Morgan's claim that we violated WAC 390-16-037, the law requires that we identify the vendor, purpose and date of expenditure, and we clearly enumerated these items in our C4.

**2) Concerning the special reporting of last minute contributions**

Per PDC guidelines, during the week before the primary, campaigns should "either file the C-3 within 48 hours or file a special Last Minute Contribution (LMC) report." My campaign filed the required

C-3 reports within the 48-hour window in all of the instances listed here, which made filing the corresponding LMC reports unnecessary.

<https://www.pdc.wa.gov/learn/publications/candidate-instructions/registration-filing-information/special-reports>

**3) Concerning the reporting of debts and expenditures**

This debt was reported on the 7-day C-4 report, on both the original report filed on July 25th, and on the amendment to the report made on July 27th. I refer you to item 2 on page 11 of the report on file, via the link below and also attached.

<http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100779267>

Thank you once again for the opportunity to address these allegations. I have conducted my campaign business with complete transparency and integrity. I am happy to provide any additional information you may need and answer any further questions.

Sincerely,

Manka Dhingra