



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

August 31, 2021

Sent electronically to Jeanette Twitty

Subject: Complaint filed by Glen Morgan, PDC Case 95992

Dear Ms. Twitty:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed on July 11, 2021, alleging that your 2021 Campaign may have violated: (1) RCW 42.17A.220 by receiving & depositing anonymous contributions in excess of the statutory limitations; and (2) RCW 42.17A.240 by failing to disclose the candidate filing fee and provide the required expenditure details on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for political advertisements sponsored by the Campaign.

Pursuant to WAC 390-37-060(1)(d), you are receiving this formal written warning concerning your Campaign's incorrect classification of monetary contributions as anonymous contributions, the failure to timely disclose the candidate filing fee and the expenditure details for political advertisements sponsored by your Campaign. The formal written warning includes staff's expectation you will, in the future, timely and accurately file PDC reports and disclose contribution and expenditure activities as required by law. The Commission will consider the formal written warning in deciding on future Commission action if there are future violations of PDC laws or rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have any questions, please contact PDC Compliance Officer Kurt Young by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s _____
Electronically Signed Kurt Young
Compliance Officer

/s _____
Electronically Signed Peter Lavalley
PDC Executive Director



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August 31, 2021

Delivered electronically to Glen Morgan

Subject: Complaint regarding 2021 Jeannette Twitty Campaign, PDC Case 95992

Mr. Morgan,

The Public Disclosure Commission (PDC) completed its review of the complaint you filed on July 11, 2021, against Jeanette Twitty, a candidate for Tacoma Port Commissioner in 2021. The complaint alleged that the 2021 Jeannette Twitty Campaign (Campaign) may have violated: (1) RCW 42.17A.220 by receiving & depositing anonymous contributions in excess of the statutory limitations; and (2) RCW 42.17A.240 by failing to disclose the candidate filing fee and provide the required expenditure details on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for political advertisements sponsored by the Campaign.

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and reporting requirements; the Monetary Contributions reports (C-3 reports), amended C-3 reports, C-4 reports and amended C-4 reports filed by the Campaign, and the email responses from the Campaign, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On June 7, 2021, Jeannette Twitty filed a Candidate registration with the PDC declaring her candidacy for Port Commissioner for the Port of Tacoma, Position #2, selecting the Full Reporting option and listing Arlene Nation as Treasurer. Ms. Twitty was a first-time candidate for public office in 2021 and finished third in the August 3, 2021 primary election.
- On July 5, 2021, the Campaign timely filed a C-3 report disclosing \$1,100 in total contributions had been received and deposited on July 1, 2021. The C-3 report disclosed that a \$500 monetary contribution was received from Freddie Thomas on June 28, 2021, and a total of \$600 in anonymous monetary contributions had been received on June 29, 2021.
- On July 28, 2021, the Campaign filed an amended C-3 report disclosing the same \$1,100 in total contributions including the \$500 contribution received from Mr. Thomas, but the amended information re-classified the \$600 in anonymous contributions and attributed those funds to two contributors. The amended C-3 report information disclosed that a \$360 monetary contribution was received from Mattie Fails on June 23, 2021, and a \$240 monetary contribution was received from John Miller on July 1, 2021.
- On July 12, 2021, the Campaign timely filed a C-3 report disclosing \$1,300 in total contributions had been received on July 10, 2021 and deposited on July 12, 2021.

- The C-3 report disclosed the receipt of six itemized contributions of more than \$25 totaling \$900, and \$400 in anonymous monetary contributions were received and deposited into the Campaign bank account.
- On July 28, 2021, the Campaign filed an amended C-3 report disclosing the same \$1,300 in total contributions including the six itemized contributions, but the amended information reclassified the \$400 in anonymous contributions and attributed those funds to three contributors. The amended C-3 report information disclosed that a \$200 monetary contribution had been received from Marla Roberts, a \$100 monetary contribution was received from Norma Washington, and another \$100 monetary contribution was received from David Hartman. The amended information disclosed that all three contributions were received on July 10, 2021.
- On July 28, 2021, the Campaign filed an amended C-4 report covering the period May 20 through 31, 2021, disclosing that a \$216 in-kind contribution had been received from Ms. Twitty on May 20, 2021 for the candidate filing fee.
- On August 8, 2021, the Campaign filed three amended C-4 reports covering the period May 20 through July 26, 2021, disclosing the required expenditure details for: (1) several expenditures made to Charles Thrower reimbursing him for campaign-related expenses he made for political advertisements using personal funds; and (2) several expenditures made to Xpress Signs for yard signs.
- Arlene Nation, Campaign Treasurer stated that the campaign originally reported some of the contributions received at fundraising events as "anonymous" because the contributors failed to "include complete information in the contribution envelopes provided." She stated that some of the contributor (or remittance) "envelopes had a complete name in some cases and a first name in other cases. However, Jeannette knew all the people who showed up at the fundraisers, so she was able to get the remaining information once she found out that the limit on anonymous contributions was \$300."
- The Campaign indicated that once Ms. Twitty had "collected the contributor information we were able to update that information away from anonymous contributions" and file the amended C-3 reports with the correct contributor information.

Jeannette Twitty is a first-time candidate and upon notification of the reporting discrepancies, her Campaign timely filed amended C-3 and C-4 reports as requested by staff to bring her Campaign back into compliance.

Based on these findings staff has determined, in this instance, the allegations concerning the initial disclosure of anonymous contributions, and the failure to accurately disclose one expenditure and include the proper description for other expenditures, does not amount to a violation warranting further investigation or any enforcement.

However, pursuant to WAC 390-37-060(1)(d), Jeannette Twitty will receive a formal written warning concerning the incorrect classification of monetary contributions as anonymous contributions, and the failure to timely disclose a Campaign expenditure, and expenditure details as required for political advertising.

The formal written warning includes staff's expectation that Jeannette Twitty will, in the future, timely and accurately file PDC reports and disclose contributions and expenditures as required by law. The Commission will consider the formal written warning in deciding on future Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s _____
Electronically Signed Kurt Young
Compliance Officer

/s _____
Electronically Signed Peter Lavalley
PDC Executive Director

