



State of Washington

PUBLIC DISCLOSURE COMMISSION

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October 11, 2023

Sent electronically to Glen Morgan at [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding Ty Stober, PDC Case 140460

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 2, 2023. The complaint alleged that Ty Stober, an incumbent City of Vancouver council member and a candidate for the same position in the 2023 election year, may have violated RCW 42.17A.405 for receiving over-limit contributions for a candidate whose name will only be appearing on the general election ballot.

PDC staff reviewed your allegation; the applicable statute(s), rule(s), and reporting requirements; the Monetary Contribution (C-3) and Summary Campaign Contribution and Expenditure (C-4) reports filed by Ty Stober for Vancouver (Campaign); the response to the complaint submitted by Marsha Manning, Ministerial Treasurer, on behalf of the Campaign; and other relevant information to determine whether the record supports a finding of one or more violations.

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

- On January 7, 2020, Ty Stober filed a Candidate Registration (C-1) report and selected the Full Reporting Option and listed Marsha Manning as Ministerial Treasurer.
- RCW 42.17.405 limits candidates to receiving \$1,000 in contributions from any one individual or per person for each election in which the candidate's name appears on the ballot. The limits have since been the subject of periodic review and revision by rule, as required by statute.
- Only one candidate filed to run for city council member, Position No. 5 in the City of Vancouver in 2023, so there was no primary election for this race and Ty Stober's name did not appear on the 2023 primary ballot.
- Accordingly, Ty Stober was limited to one \$1,000 contribution limit from any one source during the 2023 election year, which should have been attributed to the general only since there was/is no primary election in 2023. However, in reviewing the C-3 reports filed by the Ty Stober's 2023 campaign, the Campaign disclosed receiving \$2,000 in total contributions from James Mullen. The Campaign incorrectly attributed half of the \$2,000 (\$1,000) contributions to the 2023 primary election for the contributions received from the contributor/donor noted supra.

- In its responses to the complaint, received on June 12, 2023, the Campaign, by way of the treasurer, Marsha Manning, stated: “The campaign admits to the fact that an error was made. We did miss that there was an earlier contribution from the individual prior to the 2023 contribution partially due to the fact that the printed reports do not show this. Technically though, both were reported correctly at the time they were contributed, and prior to learning that there would be no primary. As of this date a check has been written and mailed to the donor in question to return \$1,000. The campaign is willing and able to correct all necessary reports as needed.”
- On September 10, 2023, the Campaign filed a C-4 report showing a \$1,000 refund to James Mullen for the primary contribution at issue in this matter. The Campaign also amended a few C-3 reports to reattribute additional primary contributions received from other contributors.

While our review found that Ty Stober’s Campaign received and deposited overlimit contributions in violation of RCW 42.17A.405, the Campaign was under the impression that there would be additional opponents by the time they received the initial/first contribution from Mr. Mullen in 2021. Additionally, Mr. Stober’s Campaign took responsibility and promptly refunded the overlimit contribution and amended the pertinent report(s) as soon as this complaint was brought to his attention.

However, pursuant to WAC 390-37-060(1)(d), Ty Stober will receive a formal warning letter concerning his failure to adhere to the statutory contribution limits delineated in RCW 42.17A.405. The formal written warning will include staff’s expectation that Ty Stober adhere to the statutory contribution limits in all future campaigns. Additionally, Ty Stober will be informed that the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Accordingly, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Erick O. Agina, Compliance Officer

s/\_\_\_\_\_  
Peter Frey Lavalley, Executive Director

cc: Ty Stober