



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

October 24, 2023

Delivered electronically to Phil Ritter, Treasurer for Yes to East King County PUD,
phlr@sonic.net

Subject: Complaint filed by Glen Morgan, PDC Case 140772

Dear Phil Ritter:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, per WAC 390-37-060(1)(d), this serves as a formal written warning concerning Yes to East King County PUD PAC's (the Committee) failure to adhere to the statutory contribution limits outlined in RCW 42.17A.220. Staff expects the Committee to follow statutory contribution limits in all future campaigns. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

If you have questions, you may contact Tanya Mercier toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavallee
Executive Director



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October 24, 2023

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint against Yes to East King County PUD PAC, PDC Case 140772

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on August 3, 2023. The complaint alleged that Yes to East King County PUD PAC, a local ballot measure continuing committee, may have violated RCW 42.17A.220 by accepting anonymous contributions totaling over the \$300 limit in election year 2022.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; 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 26, 2022, the Committee first filed a Committee Registration (C-1pc) report and selected the Full Reporting Option. The registration listed Phil Ritter as Treasurer.
- RCW 42.17.220(4) limits unidentified contributions, except for those made by individuals/persons whose names must be recorded and maintained by a political committee's treasurer in excess of one percent of the total accumulated anonymous contributions received in the current calendar year, or \$300, whichever is more.
- Staff noted that the Committee accepted \$738.94 in anonymous contribution, which is more than allowed under the statutory scheme.
- In its responses to the complaint, received on August 14, 2023, the Committee, by way of the treasurer, Phil Ritter, stated: "We acknowledge that we received contributions to our campaign from donors who did not provide the required identifying information in the amount of \$738.94 and did not understand that the amount of such contributions in excess of \$300.00 must be transferred to the State of Washington."
- On October 12, 2023, PDC staff received a \$438.94 payment from the Committee to be escheated to the State of Washington.
- The Committee has no prior complaints.

While our review found that the Yes to East King County PUD PAC accepted and deposited over the limit anonymous contribution(s) in violation of RCW 42.17A.220, the Committee took responsibility and promptly escheated the over limit anonymous contribution to the State of Washington.

However, per WAC 390-37-060(1)(d), the Yes to East King County PUD PAC will receive a formal warning letter concerning its failure to adhere to the statutory anonymous contribution limits outlined in RCW 42.17A.220. The formal written warning will include staff's expectation that Yes to East King County PUD PAC follow the statutory contribution limits in all future campaigns. Additionally, Yes to East King County PUD PAC 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.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed
Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed
Peter Frey Lavalley
Executive Director

cc: Phil Ritter