



**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

November 6, 2023

Delivered electronically to Marsha Manning, Treasurer 2024 Monica Stonier Campaign

Subject: Complaint filed by Glen Morgan, PDC Complaint 141231

Representative Stonier and Marsha Manning,

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint he recently filed with the Public Disclosure Commission (PDC) against the 2024 Monica Stonier Campaign.

In accordance with WAC 390-37-060(1)(d), PDC staff is issuing a formal written warning to the 2024 Monica Stonier Campaign concerning the requirement that no active Campaign funds can be used to make an expenditure to a political party committee, or any other political committee, that results in a contribution being made, or a profit being generated for an event in which Campaign funds are being used. PDC staff recommends that if Representative Stonier would like to attend a political party committee event in the future, that she use surplus or personal funds to purchase the table, tickets or make a contribution. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws and rules.

PDC staff appreciates your efforts to determine the fair market value of the services provided by the \$1,250 expenditure made to the Clark County Democratic Party, and the timely refund of the \$112.83 profit or contribution that was derived for the Val Ogden Dinner table purchase.

PDC staff 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 Lavallee, PDC Executive
Director



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November 6, 2023

Delivered electronically to Glen Morgan

Subject: Complaint regarding 2024 Monica Stonier Campaign, PDC Case 141231

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 8, 2023. The complaint alleged that the 2024 Monica Stonier Campaign may have violated RCW 42.17A.430(8) by making an expenditure to attend a Clark County Democratic Party and purchasing a table using campaign funds, with a portion of the expenditure generating a profit or contribution by the party committee.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements for a legislative candidate; the applicable PDC reports filed by the 2024 Monica Stonier Campaign; and the email communications between the Respondent's Campaign Treasurer and PDC staff to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- RCW 42.17A.430(8) states that "No candidate or authorized committee may transfer funds to any other candidate or other political committee." Based on the statute, your complaint alleged the 2024 Monica Stonier (Campaign) made a prohibited contribution using 2023 active Campaign funds to the Clark County Democratic Party.
- Representative Stonier was elected State Representative in 2012 from the 17th Legislative District, Position #1, in which she served one-term, before being elected State Representative in the 49th Legislative District, Position #2, in 2016. She was re-elected to that office in 2018, 2020, and 2022, respectively.
- On January 10, 2023, Monica Stonier filed a Candidate Registration with the PDC declaring her candidacy for re-election to the office of State Representative in the 49th Legislative District, Position #2, in 2024, selecting the Full Reporting Option and listing Marsha Manning as the Ministerial Treasurer/Compliance Officer for the Campaign.
- On July 10, 2023, the Campaign timely filed a Summary Full Campaign Contributions and Expenditures report (C-4 report) covering the period June 1 through 30, 2023, disclosing that a \$1,250 Campaign expenditure was made to the Clark County Democratic Party (Committee) on June 1, 2023, to purchase a "Table at Democrat's annual fundraiser."
- Ms. Manning stated the Campaign acknowledged purchasing a table for 10 at the Committee's annual Val Ogden dinner for \$1,250.

- Ms. Manning stated that the “table was purchased as a thank you to volunteers of the Elect Monica Stonier campaign”, and the Committee acknowledged that the event table sponsors get their name listed the dinner program. She confirmed Ms. Stonier was named in the program or invites as a table sponsor and stated that candidates that attended the event were “allowed to address the attendees when time is available, and they had the option to bring yard signs and remit envelopes to display on side tables.” However, since Representative Stonier “was unable to attend the dinner...the last options were not acted on.”
- Ms. Manning stated that the Campaign contacted the Committee to get an accounting of actual dinner costs, and she added that as a past manager of the Val Ogden event, “I can speak to the process of determining ticket prices.” She stated at the end of the event dinner, “costs are calculated against income to determine what next year’s ticket price will be” and the Committee estimated the 2023 costs for the event were \$125 per ticket or \$1,250 total costs for a table of 10. She stated those costs included a reserved seat, dinner, dessert, and wine, but that the actual cost came to \$113.74 per person or a total of \$1,137.40 for a party of 10.
- Ms. Manning stated that while “the estimate was very close, no one can predict future costs exactly. The party made a profit of \$11.26 per ticket or \$112.63 per table” for a party of 10. She stated that all the accounting and figures to determine the costs of the event were supplied to her by the treasurer of the Clark County Democrats.
- On October 5, 2023, the Campaign filed a Monetary Contributions report (C-3 report) disclosing that on October 4, 2023, the Campaign received a \$112.63 miscellaneous receipt from the Committee, that was deposited into the Campaign bank account on October 5, 2023. The C-3 report filed by the Campaign included the following description for the miscellaneous receipt refund: “Refund of the amount determined to be profit on purchased table of 10 seats at the Clark Co Democrats annual fundraiser.”

PDC staff did not find evidence of violations that would require conducting a more formal investigation into the complaint or pursuing further enforcement action in this instance.

In accordance with WAC 390-37-060(1)(d), PDC staff is issuing a formal written warning to the 2024 Monica Stonier Campaign concerning the requirement that no active Campaign funds can be used to make an expenditure to a political party committee, or any other political committee, that results in a contribution being made, or a profit being generated for an event. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws and rules.

PDC staff is dismissing 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 Lavallee, PDC Executive
 Director



cc: 2023 Monica Stonier Campaign