

**Mike Gawley [WA]**

added a private note

10 August 2021

Notified to: "PDC Support" <pdcc@pdcc.wa.gov>

External Email

To Whom it May Concern:

I represent the WEA 4<sup>th</sup> Corner in the instant complaint. Please direct all future communications regarding this matter to me at the email address given below.

I am writing in response to the email below, requesting a response to the PDC complaint filed by Mr. Glenn Morgan.

In his complaint, Mr. Morgan alleges that WEA 4<sup>th</sup> Corner engaged in an unreported independent expenditure campaign in support of Rebecca Lewis, a candidate at that time running for the Whatcom County Council.

Mr. Morgan relies, exclusively, upon a screen-shot of an online post apparently posted by Ms. Lewis in which she erroneously states that: "And, to my surprise, WEA sent this out to all District Three Voters!"

Neither WEA, nor WEA 4<sup>th</sup> Corner did any such thing. Rather, WEA 4<sup>th</sup> Corner sent the mail piece at issue exclusively to its members as an internal member political communication. Under Washington law, such internal member political communications are perfectly lawful; do not result in any form of reporting obligation, and constitute neither an independent expenditure, electioneering communication, nor contribution to the candidate or ballot measure that is the subject of the communication.

See e.g. <https://www.pdc.wa.gov/learn/index-of-interpretations-by-subject/internal-political-communications-and-sponsor-identification>  
[WAC 390-05-515](#)

Attached you will find a true and complete copy of the mail piece at issue, along with relevant internal emails showing the process of cross matching our internal lists to ensure that only WEA/WEA 4<sup>th</sup> Corner members received the piece.

Please note, I have redacted the number of pieces mailed, and information regarding the process by which the member address list was created, as I do not believe that information relevant to the complaint, or our response. If, however, you believe it to be so, and wish to be provided with that information, please let me know, and the basis for your position, along with any other information you believe necessary to resolve this matter. Thank you.

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Note: This communication may contain attorney privileged or other confidential information, or may constitute attorney work product, and may not be forwarded to others without my express approval. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

Member Mail for Rebecca Lewis\_Whatcom County Council.pdf  
344.93 KB

8-10-21 response to Morgan PDC Complaint.mjg\_Redacted.pdf  
87.39 KB