



**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

March 11, 2022

Sent electronically to brokerparminder@gmail.com

Subject: Complaints filed by Glen Morgan, PDC Case 102132

Dear Parminder Singh Bhatti:

Enclosed is a copy of an electronic letter concerning a complaint filed December 29, 2021 with the Public Disclosure Commission (PDC) alleging a violation of RCW 42.17A.220 for accepting anonymous contributions totaling over the \$300 limit.

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning your acceptance of anonymous contributions as noted in the enclosed letter. This formal written warning comes with staff's expectation you comply with anonymous contribution limits in the future as required by law.

The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Peter Lavalley
Executive Director



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March 11, 2022

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Parminder Singh Bhatti, PDC Case 102132

Dear Glen Morgan:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed December 29, 2021. Your complaint alleged that Parminder Singh Bhatti, a 2021 Candidate for King County Hospital District 1, Position 4, may have violated RCW 42.17A.220 for accepting over limit anonymous contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Parminder Singh Bhatti (Campaign); and the applicable PDC reports to determine whether the record supports a finding of one or more violations.

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

- Parminder Singh Bhatti registered with the PDC on June 12, 2021 as a candidate for King County Hospital District 1, Position 4, choosing the Full Reporting option.
- Bhatti received 6.71 percent of the 64,147 ballots counted in the 2021 Primary Election and did not advance to the 2021 General Election.
- RCW 42.17A.220(4) states in part that "accumulated unidentified contributions ..., in excess of one percent of the total accumulated contributions received in the current calendar year, or three hundred dollars, whichever is more, may not be deposited, used, or expended, but shall be returned to the donor if his or her identity can be ascertained. If the donor cannot be ascertained, the contribution shall escheat to the state and shall be paid to the state treasurer for deposit in the state general fund."
- On its website, the PDC outlines the anonymous contributions a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2021, Parminder Singh Bhatti accepted anonymous contributions in the amount of \$2,850, which was \$2,550 more than the allowable limit of \$300.
- On December 10, 2021, a Monetary Contribution (C-3) report filed by Janet Miller, ministerial treasurer for Parminder Singh Bhatti, listed a total of \$5,501 in anonymous contributions as of August 20, 2021.

- On January 19, 2022, Miller amended C-3 originally filed December 10, 2021. The amended report listed \$50 in anonymous contributions as of August 20, 2021.
- Miller responded to the complaint, noting she filed the original reports based on information available to her at the time and once notified of the complaint, amended the reports after Bhatti provided contributor names.

Parminder Singh Bhatti is a first-time candidate and did not advance to the 2021 General Election. And, upon notification of the reporting requirements, the Campaign timely amended C-3 reports to bring it into compliance.

Based on these findings, staff has determined, in this instance, the allegations concerning the initial disclosure of anonymous contributions does not amount to a violation warranting further investigation or any enforcement.

However, pursuant to WAC 390-37-060(1)(d), Parminder Singh Bhatti, will receive a formal written warning concerning the incorrect classification of monetary contributions as anonymous contributions. The formal written warning includes staff's expectation Parminder Singh Bhatti, will, in the future, timely and accurately file PDC reports and disclose contributions 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 finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Peter Lavalley
Executive Director