



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

June 16, 2022

Delivered electronically to Alex Ramel at "alexwramel@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 108986

Dear Representative Ramel:

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 Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

Although in general, PDC staff does not view reporting more than what is required on the F-1 report as problematic, in this instance, over reporting caused confusion resulting in a complaint being filed. For that reason, PDC staff is reminding you about the importance of the accurate disclosure of all personal financial information on the F-1 report required to be submitted as an elected official. PDC staff expects in the future that you will file complete but accurate personal financial affairs information in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director



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June 16, 2022

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding Alex Ramel, PDC Case 108986

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 1, 2022. The complaint alleged that Alex Ramel, an incumbent State Representative and 2022 candidate for re-election to Legislative District 40, may have violated: (1) RCW 42.17A.417 for accepting contributions from foreign nationals; and (2) RCW 42.17A.710 for inaccurate reporting on the Personal Financial Affairs Statement (F-1 report).

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- Representative Alex Ramel was most recently elected to Legislative District 40 House of Representatives in the 2020 election and on January 8, 2021, submitted a Candidate Registration (C-1 report) declaring his candidacy for re-election in the 2022 election, listing Jason Bennett as Treasurer, Dean Nielsen as Consultant and choosing the “Full Reporting” option.

Allegation One - RCW 42.17A.417 for accepting contributions from foreign nationals

- RCW 42.17A.417 prohibits “foreign nationals”, defined in RCW 42.17A.005(24), from making contributions to any candidate and further prohibits a person from making contributions that are financed in any part by a foreign national or when foreign nationals are involved in making decisions regarding the contribution.
- RCW 42.17A.418 requires that each candidate that has accepted a contribution, and each out-of-state committee that has accepted a contribution reportable under RCW [42.17A.250](#), from a partnership, association, corporation, organization, or other combination of persons must receive a certification from each contributor that the contribution is not financed in any part by a foreign national and foreign nationals are not involved in making decisions regarding the contribution in any way.
- The complaint alleged that the 2022 Ramel Campaign submitted a Monetary Contribution report (C-3 report) that disclosed a contribution received on May 20, 2022 from Cypress Creek Renewables that was from a foreign national and therefore prohibited. The complaint specifically alleged that Cypress Creek Renewables was an

out-of-state corporation entirely owned by an international corporate conglomerate entity based in Europe.

- Per staff's request, the Respondent provided an electronic copy of the certification received from Cypress Creek Renewables pursuant to RCW 42.17A.418.

Allegation Two - RCW.42.17A.710 for inaccurate reporting on the F-1 report

- RCW 42.17A.710 requires, in part, disclosure of the name of any corporation, partnership, joint venture, association, union, or other entity in which is held any office, directorship, or any general partnership interest, or an ownership interest of ten percent or more; the name or title of that office, directorship, or partnership; the nature of ownership interest.
- The complaint alleged that the Respondent disclosed on previously submitted F-1 reports a 100 percent ownership interest in the for-profit corporation "100% Possible, LLC." after the corporation no longer existed.
- In his response, Representative Ramel confirmed that the complaint was correct regarding the expiration of 100% Possible, LLC. Rep. Ramel further stated that he has not conducted business through the company for several years. However, because he did have an agreement to do work related to a state agency in 2016 and 2017, he deemed it appropriate to err on the side of transparency and include it. Rep. Ramel also confirmed that the company had no income during calendar year 2021.

Regarding the alleged violation of RCW 42.17A.417 for accepting a contribution from a foreign national, staff found the submittal of the certification required by RCW 42.17A.418 to be sufficient. Based on our findings regarding this allegation, staff has determined that no evidence supports a finding of a violation that warrants further investigation and has dismissed the allegation in accordance with RCW 42.17A.755(1).

Regarding the alleged violation of RCW 42.17A.710 for disclosing inaccurate information on the F-1 report, it appears that the Respondent chose to disclose information thought to be of interest to the public in an effort to be transparent about the relationship between the Respondent and his former company ownership.

Based on our findings staff has determined that, in this instance, failure to file accurate F-1 reports does not amount to a finding of a violation that warrants further investigation.

PDC staff is reminding Rep. Alex Ramel about the importance of the accurate disclosure of all personal financial information on the F-1 report required to be submitted as an elected official, and the accurate filings of all future F-1 reports in accordance with the statutes and 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, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Kim Bradford
Deputy Director

For Peter Frey Lavalée
Executive Director

cc: Alex Ramel