

April 6, 2023

PDC Case No. 140460

Alleged Violation of RCW 42.17A.405 for accepting over limit contributions

Thank you for the opportunity to submit an answer to this complaint filed by Mr. Glen Morgan. Until this complaint was filed by Mr. Morgan, we were not aware that the campaign had accepted a contribution that exceeded legal limits. Because of the complaint, we are now able to correct an unintended mistake.

First, the campaign never accepted an “illegal overlimit contribution”. At the time the contributions were made (11/29/21 and 3/6/23), we believed that there would be at least one opponent if not two, which would have put us in a “primary”. The expectation of having a primary was the main reason for Ty Stober to be fundraising early and continuously. Mr. Morgan’s insistence that we accepted **“at least \$1,000 in illegal overlimit contributions explicitly designated for a Primary election that will never happen”** when referring to the first donation seems a little absurd considering that the donation was made in 2021, two years before we knew there would not be a primary.

Mr. Morgan seems to have gone out of his way to imply things in this complaint that are not merited or earned. His statement that we have **“willfully chosen to ignore the law and keep the illegal cash”** when referring to the earlier 2021 contribution is more “performance art” than fact. He also attempts to make a mockery of the title “compliance” when referring to me, the Treasurer/Compliance Officer, who filed the reports.

I will point out that the PDC C3 reports coming from the online reporting system don’t clearly show an “aggregate total” as implied by the heading on the report. The C3 dated 12/4/21 shows an aggregate total of \$1000 with the primary box checked. The C3 dated 3/6/23 shows an aggregate total of \$1000 with a heading saying General. When certifying that report, all looked as one would expect, not remembering that there was a separate primary aggregate as well. Either way, when the contributions were reported, they were all legal and above board.

The campaign admits to the fact that an error was made. We did miss that there was an earlier contribution from the individual prior to the 2023 contribution partially due to the fact that the printed reports do not show this. Technically though, both were reported correctly at the time they were contributed, and prior to learning that there would be no primary.

Please note that the campaign stopped actively raising money after the May ballot filing week where we learned that there would be no campaign needs. Mr. Morgan implies that the money we need to return has probably already been spent. After reading all of our reports, he should be aware that we have spent no money on the campaign other

than the **“amount of campaign cash this candidate is squandering on “compliance” costs”** and campaign overhead. We make no apologies for our expenditures.

As of this date a check has been written and mailed to the donor in question to return \$1000 (see attached). We have implemented a spreadsheet to track each donor and their single or multiple contributions so that this mistake will not happen in the future.

The campaign is willing and able to correct all necessary reports as needed. I have received an answer to my inquiry around amended reports with Primary and General contribution designations. All will be amended to read General since Mr. Stober continues to receive unsolicited donations.

Thank you again for this opportunity to clarify our actions.

Marsha Manning  
Elect Ty Stober  
Treasurer/Compliance