

Respondent Name(s)
Jeannette Twitty
Complainant Name(s)
Glen Morgan
Complaint Description
<p>Glen Morgan via the portal (Thu, 3 Aug 2023 at 11:17 AM)</p> <p>To whom it may concern,</p> <p>It has recently come to my attention that Jeanette Twitty has violated Washington State campaign finance disclosure laws per RCW 42.17A in her current campaign for Tacoma Port Commissioner. The violations are as follows:</p> <p>1) Acceptance of illegal overlimit anonymous contributions (Violation of RCW 42.17A.220(4))</p> <p>Based on the information reported by this campaign to the PDC, it appears that this campaign has accepted \$700.00 in anonymous contributions (See PDC C3 report #110161580 and also # 110154871 attached for reference) This campaign has only reported raising enough money to accept up to \$500 in anonymous contributions as the statute so clearly details in RCW 42.17A.220(4), so at least \$200 must be forfeit to the State Treasurer of this secretive anonymous contribution. The state can then proceed to waste these funds just like they typically waste most of our tax dollars. Regardless, this is the only legal remedy I can see for their lawbreaking in this case.</p> <p>Let me know if you need additional information on this one.</p> <p>Best Regards,</p> <p>Glen Morgan</p> <p>Twitty - 500 anonymous contribution - C3 - 110161580.pdf 1.11 MB</p> <p>Twitty - 200 anonymous contribution - C3 - 110154871.pdf 1.11 MB</p> <hr/> <p>Glen Morgan reported via email (Thu, 3 Aug 2023 at 11:22 AM) To: "PDC Support" pdcc@pdcc.wa.gov</p>
External Email

I will point out for the record, and this should be included in the original case file for this candidate - she has violated THIS EXACT SAME Law just a few years ago. Attached, I've included my original complaint and the obviously ignored warning letter sent from the PDC then.

Perhaps she deserves more than a warning letter this time, if compliance is the goal.

Glen

Twitty, Jeanette Complaint Return Letter (Morgan) PDC Case 95992.pdf
204.96 KB

95992 Twitty Jeannette Complaint.pdf
137.2 KB

What impact does the alleged violation(s) have on the public?

A candidate should not be allowed to accept illegal overlimit anonymous contributions from secret donors. The excess funds must be forfeit

List of attached evidence or contact information where evidence may be found

Both C3s are attached and referenced by tracking number in the complaint itself

List of potential witnesses with contact information to reach them

Just the candidate.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**CASH RECEIPTS MONETARY
CONTRIBUTIONS**

C3

Jeannette Twitty (JEANNETTE TWITTY)
TWITTY FOR PORT COMMISSIONER -
P.O.Box 110555
Tacoma, WA 98411
PORT COMMISSIONER
PORT OF TACOMA

Deposit date: 07/23/2023
Report number: 110161580
Submitted date: 07/24/2023

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
07/23/2023	a. Anonymous	\$500.00	\$500.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	\$0.00	\$0.00
	c. Loans, notes, security agreements (Schedule L)	\$0.00	
07/23/2023	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$500.00

Corresponds to amount on line 1, Schedule A to C4, and itemized below

3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
Date of deposit 07/23/2023	I certify this report is true and complete to the best of my knowledge Treasurer's signature and date - 07/24/2023			



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**CASH RECEIPTS MONETARY
CONTRIBUTIONS**

C3

Jeannette Twitty (JEANNETTE TWITTY)
TWITTY FOR PORT COMMISSIONER -
P.O.Box 110555
Tacoma, WA 98411
PORT COMMISSIONER
PORT OF TACOMA

Deposit date: 06/26/2023
Report number: 110154871
Submitted date: 06/26/2023

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
06/26/2023	a. Anonymous	\$200.00	\$200.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	\$0.00	\$0.00
	c. Loans, notes, security agreements (Schedule L)	\$0.00	
06/26/2023	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$200.00

Corresponds to amount on line 1, Schedule A to C4, and itemized below

3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
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Date of deposit
06/26/2023

I certify this report is true and complete to the best of my knowledge
Treasurer's signature and date
- 06/26/2023



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.pdca.wa.gov

August 31, 2021

Sent electronically to Jeanette Twitty

Subject: Complaint filed by Glen Morgan, PDC Case 95992

Dear Ms. Twitty:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed on July 11, 2021, alleging that your 2021 Campaign may have violated: (1) RCW 42.17A.220 by receiving & depositing anonymous contributions in excess of the statutory limitations; and (2) RCW 42.17A.240 by failing to disclose the candidate filing fee and provide the required expenditure details on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for political advertisements sponsored by the Campaign.

Pursuant to WAC 390-37-060(1)(d), you are receiving this formal written warning concerning your Campaign's incorrect classification of monetary contributions as anonymous contributions, the failure to timely disclose the candidate filing fee and the expenditure details for political advertisements sponsored by your Campaign. The formal written warning includes staff's expectation you will, in the future, timely and accurately file PDC reports and disclose contribution and expenditure activities 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.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have any questions, please contact PDC Compliance Officer Kurt Young by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s/

Electronically Signed Kurt Young
Compliance Officer

/s/

Electronically Signed Peter Lavallee
PDC Executive Director



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

August 31, 2021

Delivered electronically to Glen Morgan

Subject: Complaint regarding 2021 Jeannette Twitty Campaign, PDC Case 95992

Mr. Morgan,

The Public Disclosure Commission (PDC) completed its review of the complaint you filed on July 11, 2021, against Jeanette Twitty, a candidate for Tacoma Port Commissioner in 2021. The complaint alleged that the 2021 Jeannette Twitty Campaign (Campaign) may have violated: (1) RCW 42.17A.220 by receiving & depositing anonymous contributions in excess of the statutory limitations; and (2) RCW 42.17A.240 by failing to disclose the candidate filing fee and provide the required expenditure details on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for political advertisements sponsored by the Campaign.

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and reporting requirements; the Monetary Contributions reports (C-3 reports), amended C-3 reports, C-4 reports and amended C-4 reports filed by the Campaign, and the email responses from the Campaign, to determine whether the record supports a finding of one or more violations.

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

- On June 7, 2021, Jeannette Twitty filed a Candidate registration with the PDC declaring her candidacy for Port Commissioner for the Port of Tacoma, Position #2, selecting the Full Reporting option and listing Arlene Nation as Treasurer. Ms. Twitty was a first-time candidate for public office in 2021 and finished third in the August 3, 2021 primary election.
- On July 5, 2021, the Campaign timely filed a C-3 report disclosing \$1,100 in total contributions had been received and deposited on July 1, 2021. The C-3 report disclosed that a \$500 monetary contribution was received from Freddie Thomas on June 28, 2021, and a total of \$600 in anonymous monetary contributions had been received on June 29, 2021.
- On July 28, 2021, the Campaign filed an amended C-3 report disclosing the same \$1,100 in total contributions including the \$500 contribution received from Mr. Thomas, but the amended information re-classified the \$600 in anonymous contributions and attributed those funds to two contributors. The amended C-3 report information disclosed that a \$360 monetary contribution was received from Mattie Fails on June 23, 2021, and a \$240 monetary contribution was received from John Miller on July 1, 2021.
- On July 12, 2021, the Campaign timely filed a C-3 report disclosing \$1,300 in total contributions had been received on July 10, 2021 and deposited on July 12, 2021.

- The C-3 report disclosed the receipt of six itemized contributions of more than \$25 totaling \$900, and \$400 in anonymous monetary contributions were received and deposited into the Campaign bank account.
- On July 28, 2021, the Campaign filed an amended C-3 report disclosing the same \$1,300 in total contributions including the six itemized contributions, but the amended information reclassified the \$400 in anonymous contributions and attributed those funds to three contributors. The amended C-3 report information disclosed that a \$200 monetary contribution had been received from Marla Roberts, a \$100 monetary contribution was received from Norma Washington, and another \$100 monetary contribution was received from David Hartman. The amended information disclosed that all three contributions were received on July 10, 2021.
- On July 28, 2021, the Campaign filed an amended C-4 report covering the period May 20 through 31, 2021, disclosing that a \$216 in-kind contribution had been received from Ms. Twitty on May 20, 2021 for the candidate filing fee.
- On August 8, 2021, the Campaign filed three amended C-4 reports covering the period May 20 through July 26, 2021, disclosing the required expenditure details for: (1) several expenditures made to Charles Thrower reimbursing him for campaign-related expenses he made for political advertisements using personal funds; and (2) several expenditures made to Xpress Signs for yard signs.
- Arlene Nation, Campaign Treasurer stated that the campaign originally reported some of the contributions received at fundraising events as "anonymous" because the contributors failed to "include complete information in the contribution envelopes provided." She stated that some of the contributor (or remittance) "envelopes had a complete name in some cases and a first name in other cases. However, Jeannette knew all the people who showed up at the fundraisers, so she was able to get the remaining information once she found out that the limit on anonymous contributions was \$300."
- The Campaign indicated that once Ms. Twitty had "collected the contributor information we were able to update that information away from anonymous contributions" and file the amended C-3 reports with the correct contributor information.

Jeannette Twitty is a first-time candidate and upon notification of the reporting discrepancies, her Campaign timely filed amended C-3 and C-4 reports as requested by staff to bring her Campaign back into compliance.

Based on these findings staff has determined, in this instance, the allegations concerning the initial disclosure of anonymous contributions, and the failure to accurately disclose one expenditure and include the proper description for other expenditures, does not amount to a violation warranting further investigation or any enforcement.

However, pursuant to WAC 390-37-060(1)(d), Jeannette Twitty will receive a formal written warning concerning the incorrect classification of monetary contributions as anonymous contributions, and the failure to timely disclose a Campaign expenditure, and expenditure details as required for political advertising.

The formal written warning includes staff's expectation that Jeannette Twitty will, in the future, timely and accurately file PDC reports and disclose contributions and expenditures 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 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 Lavalley
PDC Executive Director

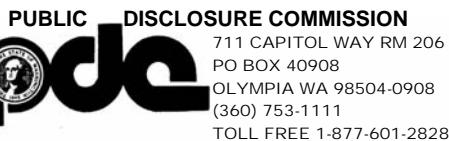


Respondent Names
Jeannette Twitty
Complainant Name
Glen Morgan
Complaint Description
<p><u>Glen Morgan</u> reported via the portal (<i>Sun, 11 Jul 2021 at 10:58 PM</i>)</p> <p>To whom it may concern,</p> <p>It has recently come to my attention that Jeannette Twitty has violated numerous campaign disclosure laws per RCW 42.17A, during her 2021 campaign for the Tacoma Port Commission. The violations are as follows:</p> <p>1) Acceptance of illegal overlimit anonymous contributions (Violation of RCW 42.17A.220(4))</p> <p>Based on the information reported by this campaign to the PDC, it appears that this campaign has accepted \$600 in anonymous contributions (See PDC C4 # 110030806 – attached for reference). This campaign has only reported raising enough money to accept up to \$300 in anonymous contributions as the statute so clearly details in RCW 42.17A.220(4), so at least \$300 must be forfeit of this secretive anonymous contribution.</p> <p>2) Failure to report any campaign expenditures (Violation of RCW 42.17A.235, .240)</p> <p>This campaign has only filed one C4 with the PDC so far, and there are no reported campaign expenditures for expenses this campaign has incurred so far. For example, this candidate has had a website for a while now. See the campaign website at www.twittyforportcommissioner.com. The expense of reserving the url, hosting the website, or producing the website is not reported. Additionally, no filing fee has been reported on any expenditure reports.</p> <p>It isn't too much to ask candidates for public office to comply with the Washington State campaign finance laws. This candidate has a Treasurer, and they should know these rules.</p> <p>Best Regards,</p> <p>Glen Morgan</p> <p>Twitty - Tac Port Comissioner cand - C3 - 7-5-21 - overlimit anonymous - PDC 110029839.pdf 23.07 KB</p>
What impact does the alleged violation(s) have on the public?
The public has a right to know how this candidate is spending their campaign funds. It should not be concealed from the public. Additionally, the public should know the source of campaign
List of attached evidence or contact information where evidence may be found
C3 attached
List of potential witnesses with contact information to reach them

Just the candidate and the treasurer. Maybe suggest they take some PDC training.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



CASH RECEIPTS MONETARY CONTRIBUTIONS

(1/02)

07-05-2021

(JEANNETTE TWITTY)

P.O.Box110555

City
Tacoma, WA

Zip + 4
98411

Office Sought (candidates)
PORT COMMISSIONER

Election Date
2021

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
06/29/21	a. Anonymous	\$600.00	\$600.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State		P R I N T	G E N	Amount	Aggregate* Total
06/28/21	FREDDIE THOMAS 1417 Saint Ann Street #A Selma, AL 36701		X			\$500.00	\$500.00
		Occupation RETIRED					
		Occupation					
		Occupation					
		Occupation					
		Occupation					
		Occupation					
		Sub-total				\$1,100.00	
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages				\$0.00	*See reverse

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$1,100.00

***See reverse
for details.**

4. Date of Deposit

07/01/21

Treasurer's Daytime Telephone No.: **12534727550**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date _____

Arlene Nation

07-05-2021