

Respondent Name(s)
Don Orange
Complainant Name(s)
Glen Morgan
Complaint Description
<p><u>Glen Morgan</u> reported via the portal (Tue, 8 Aug 2023 at 8:46 PM) To whom it may concern,</p> <p>It has come to my attention, that Don Orange, in his current campaign for Port of Vancouver Port Commissioner, violated Washington State's Campaign Finance laws (RCW 42.17A). This violation is detailed as follows:</p> <p>1) Illegal misuse of campaign funds. (Violation of RCW 42.17A.430(8))</p> <p>In this specific example, in violation of state law, Mr. Orange (not to be confused with some type of Reservoir Dogs movie reference, as cool as that might be) has illegally transferred campaign funds to a political committee, namely, the Clark County Democratic Party. This violates the state law referenced above. Mr. Orange illegally transferred this \$1249 on May 16, 2023 (See PDC C4 Report # 110149058, attached for Staff reference). The description indicates that this was for "Travel, accommodations, meals: Table for Democrat's annual Ogden Dinner for campaign volunteers."</p> <p>The Clark County Democratic Party's website indicate what this \$1249 expenditure purchases:</p> <p><i>"Your participation is critical to the success of our 2023 Ogden Dinner Awards and Auction. Table and individual tickets can be purchased <u>here</u>. Individual tickets are \$125 each. A table for 10 is \$1250. Please contact Sana Pierce-Wright, <u>shpiercewright@gmail.com</u>, if you need assistance with ticket purchases."</i></p> <p>I've posted a screen capture of the website indicating this expenditure sales effort by the Clark County Democrats, and I've highlighted the costs, etc. Weirdly, the Clark County Democrats report a different method of collecting this cash from the Orange Man, as reflected in their various C3 reports as follows:</p> <ul style="list-style-type: none"> • 5/17/2023 – Orange Man gives \$300 (PDC C3 Report #110148523, see attached) • 5/17/2023 – Orange Man again gives \$300 (PDC C3 Report #110148525, see attached) • 5/23/2023 – Oranged Man gives \$650 (PDC C3 Report #110148518, see attached) <p>I will point out for the record that the Clark County Democrats record of Mr. Orange's contributions to them do not match Mr. Orange's claims. There is a missing one-dollar difference, and it is a little weird that the amounts don't match. It appears to me that PDC</p>

staff will need to figure out who is lying – because they both can't be accurate with these reports.

However, regardless of where the missing dollar went and whether it is Mr. Orange lying or the Clark County Democrats lying about the cash they got, regardless of the result, the fair market value (FMV) of this 10 person table with food, drinks, and other details is certainly less than \$1250. This ticket purchase is an effort to solicit funds (donations) from ticket purchasers like Mr. Orange. **If Mr. Orange spent his own cash rather than his campaign cash, he would be okay, but he chose to use other people's money (also know as his campaign funds), so consistent with other similar case the PDC has handled in the recent past, the PDC must force Mr. Orange to personally reimburse his campaign the different between the \$1250 (or \$1449?) contribution his campaign illegally made to the Clark County Democrats and the FMV of the amazing table and food for 10 that he and the lucky volunteer guests consumed.** Also, it would be an acceptable and legal resolution (along with PDC approved sanctions) for the Clark County Democrats to reimburse to Mr. Orange the difference as well. Either way, whoever gives up the cash, they can resolve the practical violations documented here (in addition to the sanctions the PDC imposes on this lawbreaker).

In recognition that I can't be certain which PDC staff investigator is assigned to this case, and many staff are relatively new to the PDC, I will highlight several similar campaign finance cases which have been resolved by the PDC or the AG in the past which are identical in nature and fact pattern to this most recent Mr. Orange violation (not including the Lisa Brown addendum complaint I recently filed):

Example 1 – PDC Enforcement Case #8928 – Jim Cooper, Olympia City Councilman, Thurston County Commissioner Candidate – Also spent campaign funds on a similar program with the Thurston County Democrats (in fact, almost identical to the Mr. Orange violation detailed here). This resulted in formal sanctions from the PDC at the time (See letter attached) and also a lawsuit filed by the AG (settlement and complaint attached for reference).

Example 2 – PDC Enforcement Case #8734 – Michael Waite, Republican candidate for Washington State Treasurer – This one was the same legal violation, although more minor than the egregious Mr. Orange violation documented in this complaint.

While there is a history of other violations of **RCW 42.17A.430** which have been identified in other cases in the past, these two examples are the closest that come to mind with this most recent Mr. Orange violation.

I'm sure I'll find more violations by this campaign when I get bored and bother to look again in a few days or weeks. Unfortunately, politicians like this often have the attitude that they don't believe the laws apply to them, and they might even laugh at the PDC and its mission to enforce Washington State's campaign finance laws.

Despite this unfortunate attitude from the lawbreakers, I urge the PDC to stick to the facts and the law, which are clearly on the side of enforcement of this statute against this lawbreaker.

Best Regards,

Glen Morgan

Clark County Dems - Orange Man contribution of 300 - C3 - 110148523.pdf
1.2 MB

Clark County Dems - Orange Man contribution of 300 - C3 - 110148525.pdf
1.2 MB

Clark County Dems - Orange Man contribution of 650 - C3 - 110148518.pdf
1.2 MB

Mr Orange man - Illegal transfer of funds to the Clark County Dems - C4 - 110149058.pdf
3.25 MB

Clark County Dems - Ogden Dinner 2023 page printout.pdf
1.13 MB

Ogden Dinner - highlighted table costs.png
174.99 KB

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

The public has a right to know that a politician can follow the law and not break it. They also have a right to know how their campaign cash is being spent, and if that same politician is trying to spend their hard-earned campaign donations just as sloppily and carelessly as they plan to squander taxpayer dollars if the public makes the mistake of electing them to office.

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

Easy to document and verify. All reports are attached, and evidence is clearly provided in the exhibits and the explanation of the violation below.

List of potential witnesses with contact information to reach them

Mr. Orange man should be contacted for sure. Probably his treasurer. No way to avoid contacting the Clark County Democrats and having them sort out the true Fair Market Value of this event. All these guys should know better than to violate the law like this.

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

Clark County Democratic Central Committee (CCDCC)
Clark County Democratic Central Committee -
PO Box 179
Vancouver, WA 98666

Deposit date: 05/17/2023
Report number: 110148523
Submitted date: 05/31/2023

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
	a. Anonymous	\$0.00	\$0.00
	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	
	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$300.00

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
05/17/2023	Friends of Don Orange 6400 NE Hwy 99 # G 318 , Vancouver, WA 98665		\$300.00	N \$600.00

Date of deposit
05/17/2023

I certify this report is true and complete to the best of my knowledge
Treasurer's signature and date
Patricia Melise O'Bannon - 05/31/2023



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**CASH RECEIPTS MONETARY
CONTRIBUTIONS**

C3

Clark County Democratic Central Committee (CCDCC)
Clark County Democratic Central Committee -
PO Box 179
Vancouver, WA 98666

Deposit date: 05/17/2023
Report number: 110148525
Submitted date: 05/31/2023

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
	a. Anonymous	\$0.00	\$0.00
	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	
	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$300.00

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
05/17/2023	Friends of Don Orange 6400 NE Hwy 99 # G 318 , Vancouver, WA 98665		\$300.00	N \$600.00

Date of deposit
05/17/2023

I certify this report is true and complete to the best of my knowledge
Treasurer's signature and date
Patricia Melise O'Bannon - 05/31/2023



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**CASH RECEIPTS MONETARY
CONTRIBUTIONS**

C3

Clark County Democratic Central Committee (CCDCC)
Clark County Democratic Central Committee -
PO Box 179
Vancouver, WA 98666

Deposit date: 05/22/2023
Report number: 110148518
Submitted date: 05/31/2023

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
	a. Anonymous	\$0.00	\$0.00
	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	
	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$650.00

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
05/22/2023	Friends of Don Orange 6400 NE Hwy 99 # G 318 , Vancouver, WA 98665		\$650.00	N \$1,250.00

Date of deposit
05/22/2023

I certify this report is true and complete to the best of my knowledge
Treasurer's signature and date
Patricia Melise O'Bannon - 05/31/2023



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

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

DONALD J ORANGE (Don Orange)
Friends of Don Orange -
6400 NE Hwy 99 #G318
Vancouver, WA 98665
PORT COMMISSIONER
PORT OF VANCOUVER

Coverage: 05/01/2023 to 05/31/2023
Final report: No
Report number: 110149058
Election year: 2023
Date submitted: 06/03/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$1,000.00
2. Cash received (Schedule A line 1).	\$6,875.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$6,875.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$7,875.00
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$675.15
11. Cash expenditures (Line 3 schedule A).	\$1,537.42	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$1,537.42
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$2,212.57

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$5,662.43
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$6,000.00
20. Balance (Lines 18 - 19)		(\$337.57)

Candidate name
DONALD J ORANGE (Don Orange)

I certify this report is true and complete to the best of my knowledge
Treasurer's name and date
Linda McClain - 06/03/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
05/04/2023	\$150.00	05/11/2023	\$600.00	05/16/2023	\$5,000.00
05/06/2023	\$500.00	05/15/2023	\$100.00	05/27/2023	\$525.00

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$6,875.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$71.02
05/16/2023	Clark County Democrats PO Box 179 , Vancouver, WA 98666	Travel, accommodations, meals: Table for Democrat's annual Ogden Dinner for campaign volunteers.	\$1,249.00
05/24/2023	Morel Ink 4824 NE 42nd Ave , Portland, OR 98660	Printing literature, fliers, postcards, etc. : 1000 Business Cards	\$217.40
			\$1,537.42

4. TOTAL EXPENDITURES: \$1,537.42

Schedule L: Loans

1. LOANS RECEIVED:

Date loaned	Type	Lender/Occupation & Employment	Amount of loan	Terms	Description
05/15/2023	Cash	Don Orange 4418 NE 179th St , Vancouver, WA 98686 Aggregate total: \$6,000.00	Primary \$5,000.00	Payment Schedule: As funds become available	

2. LOAN PAYMENTS

No loans payments reported this period

3. LOANS FORGIVEN:

No loans forgiven reported this period

4. LOANS STILL OWED

Date	Lender	Original Amount	Principal Repaid or Forgiven	Amount Owed
03/01/2023	Don Orange 4418 NE 179th St , Vancouver, WA 98686	\$1,000.00	\$0.00	\$1,000.00
05/15/2023	Don Orange 4418 NE 179th St , Vancouver, WA 98686	\$5,000.00	\$0.00	\$5,000.00



Clark County Democrats Ogden Dinner Awards and Auction

Saturday, June 10, 2023
5:00 PM – 9:00 PM

Hilton Hotel
301 West 6th Street,
Vancouver, WA, 98660,
[United States \(map\)](#)



Please join the Clark County Democrats at our annual Ogden Dinner Awards and Auction, 5 PM, June 10th, 2023 at the Hilton Hotel in Vancouver, Washington. You won't want to miss the incredible line up of speakers at this year's event – details coming soon!

Gathering under the theme “Building to the Future” the 2023 dinner and auction will showcase our Democratic beliefs, principles and determination to hold together strong and keep fighting for our values to be represented in our community! Like many communities across the country, 2023 will bring the election of city



foundation needed to support candidates who share our values in these important local government elections. Looking ahead to 2024, this foundation will assist the Democrats' fight to maintain the 3rd Congressional District, U.S. Senate, and the White House.

We hope you will help us in our efforts. Your participation is critical to the success of our 2023 Ogden Dinner Awards and Auction. Table and individual tickets can be purchased [here](#).

Individual tickets are \$125 each. A table for 10 is \$1250. Please contact Sana Pierce-Wright, shpiercewright@gmail.com, if you need assistance with ticket purchases.

In addition we'd love your donation of an experience or item for the silent auction or even a package for the live auction. Please contact Peter Harrison, mrpeterjharrison@gmail.com, to make arrangements for your donation.

Thank you for your support and we look forward to seeing you in June!

[Purchase Tickets Here](#)



Clark County Democrats General Meeting, June 2023

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COUNTY DEMOCRATS

Clark County
Democrats,
7723 NE Fourth Plain
Blvd Suite C
Vancouver, WA 98662

(360) 254-9116
chair@clarkcountydems.com

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THE DEMOCRAT NEWSLETTER

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from the Clark
County Democrats.

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keep fighting for our values to be represented in our community! Like many communities across the country, 2023 will bring the election of city councils, school boards, and port commissioner races to Clark County. A successful 2023 Ogden Dinner Awards and Auction will give us the firm foundation needed to support candidates who share our values in these important local government elections. Looking ahead to 2024, this foundation will assist the Democrats' fight to maintain the 3rd Congressional District, U.S. Senate, and the White House.

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Thank you for your support and we look forward to seeing you in June!

[Purchase Tickets Here](#)