

To Whom it May Concern --

It has come to my attention that "Rohait Patnaik Manka for 45th", a political committee, has violated provisions of **RCW 42.17A**.

**1) Failure to list all committee officers. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.**

The PAC failed to list Rohait Patnaik and John Pressman as committee officers, which is required by **RCW 42.17A.205(2)(c)**. Additionally, I have reason to believe that agents of the Manka Dhingra campaign are also serving as officers of this PAC, which is deeply troubling.

**WAC 390-05-245** defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee" .

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

**2) State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."**

Despite making many decisions for the Committee, Rohait Patnaik and John Pressman are not listed on the C1PC. In their roles as officers, these individuals doubtlessly made illegal expenditures on behalf of the committee.

**3) Failure to file contribution and expenditures reports. (Violation of RCW 42.17A.235, see WAC 390-16-105)**

When the Committee filed its paperwork on May 15th, 2017, it filed for the mini-reporting option.

I have reason to believe that Committee does not qualify for the mini-reporting option under the criteria established in **WAC 390-16-105**. Specifically, I believe that Rohait Patnaik has contributed (either cash or in-kind) more than \$500 to the Committee.

**4) State law requires that committees receiving an earmarked contributions complete a report, entitled "Earmarked Contributions" on a form labeled by the commission as "Special Report E" that identifies the name and address of the person who made the contribution, the candidate or political committee for whose benefit the contribution is earmarked, the amount of the contribution, and the date that the contribution was received; and mail or deliver to the commission and the candidate or political committee benefiting from the contribution a copy of the "Earmarked contributions" report within two working days of receipt of the contribution. RCW 42.17A.270.**

**An earmarked contribution is defined as any contribution (including a pledge per RCW 42.17A.005) given to an intermediary or conduit, either a political committee, candidate or third party, with a designation, instruction, or encumbrance, whether direct or indirect, express or implied, oral or written, which is intended to result in or which does result in all or any part of the contribution being made to or for the promotion of certain candidates, state officials, or ballot propositions. WAC 390-16-240 (1).**

When the C1PC was filed, it was noted that the PAC was formed with the express purpose of making expenditures in support of Manka Dhingra for State Senate.

Thus, it is expressly clear that any contributions received by this committee are earmarked contributions for the benefit of Manka Dhingra that must be reported as such. As stated in **WAC 390-16-105**, committees who engage in mini-reporting are not exempted from the requirements of **RCW 42.17A.270**. On information and belief, I believe the Committee has collected contributions for Dhingra that have not been disclosed on an earmarked contribution form.

The PDC should investigate the possibility this committee committed the above violations maliciously, if these violations were committed in an effort to evade public scrutiny and campaign finance disclosure, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan