

**Subject:** RE: PDC - Schwerin, Campbell, Bernard, Iglitzin, & Lavitt, LLP: Alleged violations of Chapter 42.17A RCW for failure to accurately and timely register as a political committee, or report contribution, expenditures, independent expenditures, and lobbyi...

**Description:**

Dear Ms. Hansen,

Thank you for following up with us regarding this matter.

We do not have any “mitigating” factors to provide in response to Mr. Morgan’s complaint, because his allegations have absolutely no merit whatsoever. His allegations state that activities that “may” be happening, “on information and belief,” with no support—and there can be no support, because they are absolutely unfounded and untrue.

- 1) **Our firm is not a political committee.** Our firm has not failed to register as a political committee because the firm and its attorneys do not have “the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.” RCW 42.17A.005(40). We are not a political committee. We provide legal services to paying clients of our firm, some of whom are political committees or candidate committees/candidates. Committees and candidates enlist the services of consulting firms, law firms, and other entities to assist in ensuring compliance with Washington’s campaign finance laws. In no statute or regulation is it required that such firms be registered as political committees in order to perform such work. This does not require registration as a committee, and does not require filing of any C-3 or C-4 reports by the firm to the PDC.
- 2) **Our firm and its attorneys have not engaged in any independent expenditures.** Without any support for his claim, Mr. Morgan simply asserts that we “may” have engaged in independent expenditures. We have not done so. Because our firm has not engaged in any independent expenditures, we therefore have no obligation to file any C-6 forms.
- 3) **Our firm and its attorneys are not lobbyists, and do not engage in lobbying.** Contrary to the summary one-sentence unsupported allegation that our firm and/or its attorneys have somehow failed to abide by lobbyist registration requirements (again, “on information and belief”), no one at our firm is engaged in “attempting to influence the passage or defeat of any legislation by the legislature of the state of Washington, or the adoption or rejection of any rule, standard, rate, or other legislative enactment of any state agency under the state administrative procedure act” or engaged in any lobbying on our own or on another’s behalf, which are the definitions of lobbying and lobbyist under RCW 42.17A.005(33) and (34).

His allegations seem to be based on a fundamental misunderstanding of both campaign finance law and of the practice of law. His allegations should be dismissed outright, as they are utterly unfounded and frivolous.

If you have any questions, please do not hesitate to contact me or Dmitri Iglitzin, copied here.

Thank you,

Laura Ewan

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