



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

Campaign Finance Unit  
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**Delivered by electronic mail**

April 20, 2017

Glen Morgan  
1001 Cooper Point Road SW #140-222  
Olympia, WA 98502  
[glenmorgan89@gmail.com](mailto:glenmorgan89@gmail.com)

**RE: Citizen Action Notices against Manka Dhingra (1) & (2)**  
**Notice of Results**

Dear Mr. Morgan:

I am writing on behalf of the Attorney General's Office to notify you of the outcome of the AGO review of your citizen action notices filed on February 15 and 21, 2017, respectively. Your notices alleged that Manka Dhingra committed multiple violations of the state campaign finance disclosure laws contained in RCW 42.17A. You previously filed these allegations in a complaint to the state Public Disclosure Commission.

The AGO reviewed your allegations from both notices and assessed them as follows:

1. Failure to disclose contributions and expenditures for reserving web domain. A debt of \$59.40, dated February 11, 2017, was listed as an in-kind loan on the candidate's amended form C-4 filed March 23, 2017. This disclosure appears to be two weeks late, but is far ahead of the date of the 2017 primary or general election.
2. Failure to timely file form C-1 (Candidate Registration). Respondent states that she first became a candidate on January 31, 2017, and that this form was timely filed within the two week window provided by law. Although she reserved web domain space on January 9, 2017, there is no evidence that she used the web domain for a campaign prior to January 31, 2017.
3. Failure to timely file form F-1 (Personal Financial Affairs Statement). This form was filed on February 22, 2017, apparently nine days after it was due.
4. Failure to timely disclose monetary contributions. You allege the Respondent received \$40,375 in monetary contributions from February 4 through February 9, 2017, and failed to disclose this activity on February 13, 2017, the day she filed form C-1 (Candidate Registration); the activity was disclosed in reporting filed on February 17, 2017.

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Although these disclosures were apparently four days late, the untimeliness is due to the Public Disclosure Commission's delay in issuing filer identification numbers to newly registered campaigns. Because a short period of time may exist between when a committee registers and when it may have the ability to file electronically, there may naturally be a short period before reports can be uploaded. These reports appear to have been filed as soon as the Respondent received the necessary filer identification number allowing her to upload the reports.

5. Failure to disclose contributions and expenditures related to photography and campaign website. No evidence was provided in your notice that the photographs were professionally done or had any cost associated with them.

Having completed the review of the allegations in your notice, the AGO has determined not to proceed with a court enforcement action under RCW 42.17A on these allegations. We have determined, in an exercise of prosecutorial discretion, that any viable allegations in your notice are more appropriate for resolution by the Public Disclosure Commission, as opposed to the Superior Court. The Commission has jurisdiction over the allegations because you first filed the complaint there; as such, any decision on how to respond to the allegations will be left with the Commission. Following review, the Commission may choose to institute an enforcement proceeding related to your notice. If you have further questions, please contact me at (360) 586-0710.

Sincerely,



WALTER M. SMITH  
Assistant Attorney General

WMS:kj

cc: Darwin Roberts, Deputy Attorney General  
Manka Dhingra, Respondent  
John Gerberding, King County Prosecutor's Office  
Jon Tunheim, Thurston County Prosecutor's Office  
Evelyn Fielding Lopez, Executive Director – Public Disclosure Commission