

Info replied (Tue, 10 Sep 2024 at 1:21 PM)

To: "PDC Support" pdc@pdc.wa.gov

External Email

Hello Tabatha,

A response to the complaint is attached.

My best,

Fernando Medina Corey

Co-Chair



Seattle Democratic
Socialists of America

20240010 - Response to PDC Complaint.pdf

119.34 KB



We write in response to the complaint filed against Seattle Democratic Socialists of America (“Seattle DSA”). Seattle DSA made a good faith determination that it is not a political committee pursuant to RCW 42.17A.205 based on the guidelines provided in PDC Interpretation 07-02.

Seattle DSA is an IRC Section 501(c)(4) social welfare organization primarily formed to promote social welfare through support and advocacy of socially democratic issues on local, state and national levels and educate the public about the socially beneficial policies of the democratic socialist ideology.

RCW 42.17A.005(41) provides that a person must register as a political committee if it expects to receive contributions or make expenditures in support of or opposition to a candidate or ballot measure. Seattle DSA receives income from member dues and solicits general donations to support the organization’s general activities. It does not solicit contributions for the purpose of supporting or opposing candidates or ballot measures.

PDC Interpretation 07-02 provides guidance to determine whether expenditures to support or oppose candidates and ballot measures are an organization’s primary purpose requiring registration as a political committee. After reviewing and considering the factors presented in the interpretation, we made a good faith determination that Seattle DSA is not a political committee and is not required to register and file campaign finance reports.

Seattle DSA’s stated purpose on its Articles of Incorporation is to promote social welfare through support and advocacy of socially democratic issues and educate the public about the socially beneficial policies of the democratic socialist ideology. While we are formed to promote a political ideology, it does not de facto make us a political committee.

Seattle DSA made contributions to support candidates and ballot measures, however, it is not our primary purpose. We are transparent in all our electoral activities, properly and timely providing political committees notice of contributions made. The receiving political committees have disclosed the contributions received on their campaign reports.

We endorse candidates and ballot measures that align with Seattle DSA’s policies and ideology. Seattle DSA’s endorsement allows a candidate or ballot measure to gain support from our membership, a valuable resource. Because of our limited financial resources, the organization is selective in expenditures made. Rather, we rely on the volunteer efforts from our membership to provide support for endorsed candidates and ballot measures.

PDC Interpretation 07-02 provides guidance that an organization’s political expenditures should be less than 30% of its overall treasury budget. We made only one contribution in 2021 and 2022 for \$1000 and \$1500 respectively. In 2023 and 2024, we engaged in efforts to support Renton’s Raise the Wage campaign, a single ballot measure, making contributions totaling \$36,892.21 which represents approximately 26% of our overall treasury expenditures made in 2023 and 2024 to date. Again, we rely on the volunteer efforts from our membership, however, we made expenditures to support this measure because it aligned with our policies and ideology.



Based on these facts and circumstances, we made the good faith determination that Seattle DSA is not a political committee pursuant to RCW 42.17A.005(41). We do not solicit contributions for the purpose of supporting or opposing candidates or ballot measures and our primary purpose is not to make expenditures to support or oppose candidate or ballot measures.

We appreciate the opportunity to respond to the complaint. Please let us know if you have any questions.

Sincerely,
Fernando Medina Corey
Co-chair
Seattle Democratic Socialists of America

Date: September 10, 2024

Signed by: Fernando Medina Corey

Signature:

A handwritten signature in black ink, appearing to read 'FM Corey', written over a horizontal line.