



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

May 17, 2019

Delivered electronically to Harrison Toepfer, Committee Chair at “chair@17thdems.org”

Subject: Complaint filed by Glen Morgan, PDC Case 16475

Dear Mr. Toepfer:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of the timely and accurate disclosure of all contributions and expenditure activities, the timely deposit of monetary contributions within five (5) business days of receipt, and the timely filing of the C-1pc disclosing material changes. PDC staff expects in the future that you will submit all contributions and expenditure activities, deposit monetary contributions within five (5) business days of receipt, and the timely file the C-1pc disclosing material changes in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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May 17, 2019

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding 17th Legislative District Democrats, PDC Case 16475

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 7, 2017. Your complaint alleged that the 17th Legislative District Democrats, a bona fide legislative district party committee, may have violated: (1) RCW 42.17A.220 for failure to deposit monetary contributions within five business days of receipt; (2) RCW 42.17A.205 for failure to accurately and completely disclose committee officers on the Committee Registration (C-1pc report); (3) RCW 42.17A.425 for allowing persons not identified as committee officers on the C-1pc to authorize expenditures; and (4) RCW 42.17A.265 for failure to file special reports or last minute contribution reports (LMC reports), within twenty-four hours, disclosing contributions of \$1,000 or more in the aggregate made to candidates within 21-days of the 2016 general election.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by the 17th Legislative District Democrats; the applicable PDC reports filed by Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- On February 13, 2016, the 17th Legislative District Democrats (17THLD) filed a Committee Registration (C-1pc report) registering a bona fide legislative district party committee for calendar year 2016 and choosing the “Full Reporting” option.

Allegation Two & Three: Violation of RCW 42.17A.205 for failure to accurately and completely disclose Tanisha Harris and Marsha Manning as committee officers on the Committee Registration (C-1pc report) and RCW 42.17A.425 for allowing Ms. Harris and Ms. Manning to authorize expenditures.

- In response to the complaint, the 17THLD agree that Marsha Manning should have included on the C-1pc filed for calendar year 2016 but was inadvertently left off due to an internal misinterpretation of the statute. The committee confirmed that Tanisha Harris was a committee officer in 2016 and was not involved in decision making for the committee.

Allegation One & Four: Violation of RCW 42.17A.220 for failure to deposit a \$5,000 monetary contributions from the Washington & Northern Idaho District Council of Laborers PAC within five business days of receipt and RCW 42.17A.265 for failure to file a last minute contribution reports (LMC reports) disclosing a \$2,500 contribution made to the Friends of Sam Kim 2016 candidate campaign and a \$2,000 contribution made to the Elect Tim Probst 2016 candidate campaign, within twenty-four hours as required when made within 21-days of the 2016 general election.

- Staff's review of the C-3 and C-4 reports filed by the 17THLD during the 2016 election and the review of the evidence provided with the complaint, indicated that the majority of campaign activity conducted by the 17THLD appeared to timely deposited and disclosed. However, PDC staff found a few instances in which it appeared that some of the contributions disclosed on C-3 reports were not timely deposited and staff found two contributions made during the 21-day pre-general election special reporting period that were not disclosed within the required twenty-four hour time period.
- In their response, the 17THLD stated that the \$5,000 contribution from Washington & Northern Idaho District Council of Laborers PAC was received and deposited timely but disclosed with an inaccurate date due to a minor clerical error. In addition, the committee acknowledged that there were two contributions made during 2016 that were not disclosed within twenty-fours as required, however they have brought this matter to the attention of the treasurer to prevent similar errors in the future. In addition, the committee stated that these contributions were accurately disclosed on the 7-day pre-general C-4 report which was timely submitted.

Based on these findings, staff has determined that, in this instance, failure to timely amend the committee registration to include a committee officer and failure to timely and accurately disclose a small number of contributions on a last minute contribution report, does not amount to an actual violation warranting further investigation.

PDC staff is reminding the 17th Legislative District Democrats about the importance of the timely and accurate disclosure of all contributions and expenditure activities, the timely deposit of monetary contributions within five (5) business days of receipt, and the timely filing of the C-1pc disclosing material changes in future calendar years in accordance with the statutes and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee

Executive Director

cc: 17th Legislative District Democrats