



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

April 23, 2019

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Walla Walla County Democratic Central Committee, PDC Case 46694

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on February 3, 2019. The complaint alleged that the Walla Walla County Democratic Central Committee (Committee), a Continuing Bona Fide Political Party Committee, may have violated RCW 42.17A.235 by failing to timely and accurately file contribution (C-3) and expenditure (C-4) reports.

The PDC staff reviewed your allegations; the applicable statutes, rules and reporting requirements; the applicable C-3 and C-4 reports filed by the Committee; and the response provided by the Committee.

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

Allegation: Failure to file accurate, timely C-3 and C-4 reports.

- PDC staff reviewed the 80 C-3 and C-4 reports included with your complaint in a spreadsheet. Staff found that all the alleged late-filed reports were filed between seven and 347 days late. 12 of the late reports, accounting for \$2,341 in contributions and \$4,568 in expenditures, fell within the critical or the accelerated reporting period and therefore deprived the public of critical information.
- In its response to the allegation, the Committee, by way of Nancy Monacelli, stated, "there were a number of personal and technical issues which contributed to the late reporting. Nonetheless, the reporting was late, and I take full personal responsibility for that. I have endeavored to make things right and have brought all the reporting up to current status."

While the Committee failed to timely file most C-3 and C-4 reports in 2018, it has now filed all its missing reports with the PDC. The missing reports were filed by the Committee prior to this complaint being filed. The Committee has also put measures in place to ensure timely filing of all future reports as required by the PDC laws and rules. This shows a good faith effort by the Committee to comply with the statutory reporting requirements in the future. Lastly, the Committee has no prior violations.

Based on these findings staff has determined that, in this instance, the failure to file timely C-3 and C-4 reports, does not amount to an actual material violation warranting further investigation or enforcement action.

However, pursuant to WAC 390-37-060(1)(b), the Walla Walla County Democratic Central Committee will receive a formal written warning concerning its failure to timely file C-3 and C-4 reports in 2018. The formal

written warning will include staff's expectation that the Walla Walla Democratic Central Committee will timely file C-3 and C-4 reports in the future. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules by the Committee.

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)(a).

If you have questions, you may contact Erick Agina at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov.

Sincerely,

Endorsed by,

s/_____
Erick Agina, Compliance Officer

s/_____
BG Sandahl, Deputy Director
For Peter Lavallee, Executive Director

cc: Nancy Monacelli, Treasurer
Walla Walla County Democrats

