



**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 5, 2019

Delivered electronically to "phil@seattlecfo.com"

Subject: PDC Case 46701

Dear Campaign to Prevent Fraud and Protect Seniors:

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

As noted below to Glen Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely disclosing all contribution & expenditure activity and the timely filing of all future PDC reports, include the C-4 report. PDC staff expects that you will fully disclose contributions & expenditures in future years in accordance with PDC laws and rules.

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

April 5, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Campaign to Prevent Fraud and Protect Seniors, PDC Case 46701

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on February 3, 2019. Your complaint alleged that Campaign to Prevent Fraud and Protect Seniors may have violated RCW 42.17A.235 & .240 by failing to timely & accurately report contributions & expenditures.

PDC staff reviewed your allegations and, as a result, found the following:

- Campaign to Prevent Fraud and Protect Seniors (the "Respondent") is a 2016 ballot committee that registered with the PDC on March 30, 2016.
- The Respondent submitted its post-general C-4 report containing November of 2018 contributions & expenditures on January 9, 2019, which is 30 days late.
- All other C-4 reports for 2018 were timely filed by the Respondent with the PDC and the vast majority of the expenditures disclosed therein were for legal/compliance and accounting purposes, as opposed to electoral activity.
- The late report disclosed \$12,000 in contributions, \$18,875 in expenditures for legal costs, and \$500 in debts, obligations or orders placed. The late-reported contributions & expenditures represent less than 1% of the Respondent's total contributions & expenditures for 2018.
- The Respondent made a good-faith effort to remedy its omission by filing the missing report for November on January 9, 2019. The Respondent indicated that, because it is a 2016 ballot committee, the financial activity disclosed on the late report did not pertain to an upcoming election or deprive the public of critical information.

Based on these findings, staff has determined that, in this instance, failure to timely & accurately report contributions & expenditures for November of 2018 does not amount to an actual violation warranting further investigation.

PDC staff is reminding Campaign to Prevent Fraud and Protect Seniors about the importance timely disclosing all contribution & expenditure activities, and the timely filing of all future PDC reports, include the C-4 report.

The PDC has dismissed the matter and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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

cc: Campaign to Prevent Fraud and Protect Seniors