

Complaint Description

Glen Morgan (Wed, 17 Jul 2019 at 1:00 AM)

To whom it may concern,

It has come to my attention that the Whatcom County Democratic Central Committee during the 2018 election cycle violated Washington State's campaign finance laws (**RCW 42.17A**).

1) Accepting Illegal Over limit Anonymous Contributions (Violation of RCW 42.17A.220 (4))

The Whatcom County Democrats violated Washington State's campaign finance laws by accepting more than \$300 in anonymous contributions from donors. Specifically, it appears that this committee accepted \$424 in anonymous contributions, which is \$124 more than the allowable anonymous contribution limit defined in **RCW 42.17A.220 (4)**.

Upon reviewing the expenditures by this political committee, there is no evidence supporting any claim these funds were eschewed to the Treasury of the State of Washington as is required in law. Therefore this is a violation of the statute, and these funds should be immediately forfeited to the Washington State Treasury.

I've attached the relevant C3 contribution reports which detail all the anonymous contributions received by this committee during the 2018 calendar year. **This candidate must forfeit \$124 to the Washington State Treasury immediately.** In this way, these funds can be squandered along with the rest of the general fund tax dollars, but at least this forfeiture of anonymous dark money funds may discourage others from doing the same in the future.

This political committee should be warned (once again) about not taking secretive, dark money anonymously to fund political campaigns. This is a serious violation of Washington's State campaign finance laws and counter to the spirit and intention of transparency in the political process. Please note, this committee has been warned in the recent past about their serial campaign finance violations and difficulty complying with the state's campaign finance laws (See PDC warning letter attached for **PDC Enforcement Case #26305**).

Please feel free to contact me if you have any further questions on this matter.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to have local political parties who do not fund their political campaigns by secretive, anonymous dark money funding as this campaign chose to do. This political committee must forfeit these illegal dark money funds and send them to the Washington State Treasury where they can be squandered with the rest of the General Fund. At least it will send a message to future dark money anonymous donors that their money is not welcome, even in political committees with a history of violating campaign finance laws like this one.

List of attached evidence or contact information where evidence may be found.

see attached

List of potential witnesses with contact information to reach them.

Just the Committee officers should be adequate

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100809156

01-18-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
01/16/18	a. Anonymous	\$15.00	\$15.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
01/16/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>2</u> (persons)	\$50.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: * Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$65.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$65.00

4. Date of Deposit

01/16/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

01-18-2018

Treasurer's Daytime Telephone No.: (360) 384-0861

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100812900

02-20-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
02/16/18	a. Anonymous	\$5.00	\$20.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
02/16/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>21</u> (persons)	\$169.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: * Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$174.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$174.00

4. Date of Deposit

02/16/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

02-20-2018

Treasurer's Daytime Telephone No.: (360) 384-0861

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100821749

03-19-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
03/16/18	a. Anonymous	\$12.00	\$32.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
03/16/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>17</u> (persons)	\$156.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
03/16/18	MICHAEL CHIAVARIO 2221 SOUTH AVE BELLINGHAM, WA 98225				\$5.00	\$35.00
	Occupation					
03/16/18	PEGGY BORGENS 5648 ORCHARD DR FERNDAL, WA 98248				\$5.00	\$39.00
	Occupation					
03/16/18	ALEXA ANDREWS 2715 GROVE ST BELLINGHAM, WA 98225				\$20.00	\$51.00
	Occupation					
03/16/18	JUDY ANDERSON-BJORNSTAD 621 MARINE DR BELLINGHAM, WA 98225				\$20.00	\$35.00
	Occupation					
03/16/18	KEVIN RANKER PO BOX 3354 FRIDAY HARBOR, WA 98250				\$30.00	\$30.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			\$248.00	*See reverse for details.
		Amount from attached pages			\$50.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$298.00

4. Date of Deposit

03/16/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

03-19-2018

Treasurer's Daytime Telephone No.: **(360)384-0861**

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.)
whatcom county democratic central committee

Deposit Date
03/16/18

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
03/16/18	JUDITH KRIEGER 1313 HERITAGE HILLS COURT BELLINGHAM, WA 98226	Occupation			\$25.00	\$50.00
03/16/18	MILTON KRIEGER 1313 HERITAGE HILLS COURT BELLINGHAM, WA 98226	Occupation			\$25.00	\$50.00
		Occupation				
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		Occupation				

Page Total \$50.00

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100832169

05-27-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
05/25/18	a. Anonymous	\$5.00	\$37.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
05/25/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>25</u> (persons)	\$345.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
05/25/18	CAROL MELIGAN 3316 CHERRYWOOD AVE BELLINGHAM, WA 98225				\$20.00	\$70.00
	Occupation					
05/25/18	PATRICIA BARTZ 2528 S PARK DR BELLINGHAM, WA 98225				\$100.00	\$200.00
	Occupation	NONE				
05/25/18	JAMIE DOUGLASS 3353 BAKERVIEW RD #105 BELLINGHAM, WA 98226				\$20.00	\$62.00
	Occupation					
05/25/18	PEGGY BORGENS 5648 ORCHARD DR FERNDAL, WA 98248				\$5.00	\$54.00
	Occupation					
05/25/18	SUSAN MOEN 4949 SAMISH WAY UNIT 3 BELLINGHAM, WA 98229				\$5.00	\$85.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			\$500.00	*See reverse for details.
		Amount from attached pages			\$112.00	
					\$612.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit

05/25/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

05-27-2018

Treasurer's Daytime Telephone No.: (360) 384-0861

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.)
whatcom county democratic central committee

Deposit Date
05/25/18

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
05/25/18	MICHAEL CHIAVARIO 2221 SOUTH AVE BELLINGHAM, WA 98225	Occupation			\$5.00	\$60.00
05/25/18	VICTORIA SAVAGE po box 638 deming, WA 98244	, WA Occupation RETIRED			\$7.00	\$127.00
05/25/18	PETER DREWES 912 34TH ST BELLINGHAM, WA 98229	Occupation			\$5.00	\$35.00
05/25/18	MAGGIE HANSON 206 BAYSIDE PL BELLINGHAM, WA 98225	Occupation			\$5.00	\$77.00
05/25/18	REBECCA OBRINE-WILLSON 921 W LK SAMISH DR BELLINGHAM, WA 98229	Occupation			\$40.00	\$40.00
05/25/18	JIM STEWART 5852 STORR RD. FERNDAL, WA 98248	Occupation			\$25.00	\$75.00
05/25/18	PEGGY STEWART 5852 STORR RD. FERNDAL, WA 98248	Occupation			\$25.00	\$75.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				

Page Total \$112.00

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100834366

06-04-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
05/31/18	a. Anonymous	\$5.00	\$42.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
05/31/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>55</u> (persons)	\$980.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
05/31/18	DARRIN HALL 5966 monument dr ferndale, WA 98248				\$20.00	\$70.00
	Occupation					
05/31/18	MARIAN BEDDILL 2200 OLD FAIRHAVEN PKWY APT 1C BELLINGHAM, WA 98225				\$10.00	\$40.00
	Occupation					
05/31/18	KELLI LINVILLE 3123 ELDRIDGE AVE BELLINGHAM, WA 98225				\$100.00	\$100.00
	Occupation					
05/31/18	CORRINE SIEGEL 316 w lake samish dr trlr 30 bellingham, WA 98229				\$50.00	\$50.00
	Occupation					
05/31/18	DANIEL HENNESSY 853 san juan blvd #2 bellingham, WA 98229				\$30.00	\$30.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			\$1,195.00	*See reverse for details.
		Amount from attached pages			\$150.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$1,345.00

4. Date of Deposit

05/31/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

06-04-2018

Treasurer's Daytime Telephone No.: (360)384-0861

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.)
whatcom county democratic central committee

Deposit Date
05/31/18

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
05/31/18	MARIAN BEDDILL 2200 OLD FAIRHAVEN PKWY APT 1C BELLINGHAM, WA 98225	Occupation			\$30.00	\$40.00
05/31/18	RACHEL GARCIA 612 virginia st bellingham, WA 98225	Occupation			\$40.00	\$40.00
05/31/18	WYNNE A LEE 2171 TUTTLE LN LUMMI ISLAND, WA 98262	Occupation			\$40.00	\$80.00
05/31/18	WYNNE A LEE 2171 TUTTLE LN LUMMI ISLAND, WA 98262	Occupation			\$40.00	\$80.00
		Occupation				
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		Occupation				
		Occupation				

Page Total \$150.00

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100852758

08-14-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
08/09/18	a. Anonymous	\$23.00	\$65.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
08/09/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>2</u> (persons)	\$50.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: * Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
08/09/18	KATHLEEN SPARKES 4139 JADE PLACE BELLINGHAM, WA 98226	, Occupation RETIRED			\$100.00	\$300.00
08/09/18	ROBERT HALL 1155 N STATE ST #620 BELLINGHAM, WA 98225	daylight properties bellingham, WA Occupation PROPERTY MANAGEMENT			\$3,429.00	\$3,429.00
08/09/18	PROCEEDS FROM LOW COST ,	Occupation			\$37.00	\$0.00
08/09/18	JASON HECK 1420 e maplewood ave BELLINGHAM, WA 98225	Occupation			\$50.00	\$50.00
08/09/18	JESSICA HECK 1420 e maplewood ave BELLINGHAM, WA 98225	Occupation			\$50.00	\$50.00
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total Amount from attached pages			\$3,739.00 \$0.00	*See reverse for details.

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$3,739.00

4. Date of Deposit

08/09/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

08-14-2018

Treasurer's Daytime Telephone No.: **(360)384-0861**

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100853900

08-22-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
08/20/18	a. Anonymous	\$200.00	\$265.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
08/20/18	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	\$90.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
08/20/18	HARDIAL SANGHA 8611 DEPOT RD APT 122 LYNDEN, WA 98264				\$20.00	\$80.00
	Occupation					
08/20/18	SANDRA PETERSON 1015 RAILROAD AVE #310 BELLINGHAM, WA 98225				\$50.00	\$50.00
	Occupation					
08/20/18	PROCEEDS FROM LOW COST ,				\$421.00	\$0.00
	Occupation					
08/20/18	HELEN SCHOLTZ 2901 26TH STREET BELLINGHAM, WA 98225				\$100.00	\$100.00
	Occupation					
08/20/18	RICHARD SCHOLTZ 2901 26TH STREET BELLINGHAM, WA 98225				\$100.00	\$100.00
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$981.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$981.00

4. Date of Deposit

08/20/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

08-22-2018

Treasurer's Daytime Telephone No.: **(360)384-0861**

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100860042

09-21-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
09/18/18	a. Anonymous	\$25.00	\$290.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
09/18/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>3</u> (persons)	\$60.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
09/18/18	KATHLEEN BANDER 1841 EAST SMITH RD BELLINGHAM, WA 98226				\$50.00	\$50.00
	Occupation					
09/18/18	ROBINA PAGE 5720 WINGATE DR FERNDAL, WA 98248				\$100.00	\$100.00
	Occupation					
09/18/18	JEFF HINKEL 2215 UTTER ST BELLINGHAM, WA 98225				\$110.00	\$120.00
	Occupation	RETIRED				
09/18/18	MICHELE KAMMERER 5461 NOON RD BELLINGHAM, WA 98226				\$21.00	\$244.00
	Occupation	RETIRED				
09/18/18	MATT THUNEY 3457 HILLSIDE RD DEMING, WA 98244				\$50.00	\$70.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			\$416.00	*See reverse for details.
		Amount from attached pages			\$6,118.00	
					\$6,534.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit

09/18/18

Treasurer's Daytime Telephone No.: (360)384-0861

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

09-21-2018

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.)
whatcom county democratic central committee

Deposit Date
09/18/18

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
09/18/18	KENNEDY FUND 119 1st ave south suite 320 BELLINGHAM, WA 98225	Occupation			\$5,500.00	\$5,500.00
09/18/18	FRANK MORROW 1467 GLENCOVE LANE BELLINGHAM, WA 98229	, Occupation RETIRED			\$100.00	\$150.00
09/18/18	PROCEEDS FROM LOW COST ,	Occupation			\$18.00	\$0.00
09/18/18	EDWARD L THOMPSON 6670 TUT TERRACE BELLINGHAM, WA 98226	, Occupation NONE			\$50.00	\$105.00
09/18/18	ANITA M THOMPSON 6670 TUT TERRACE BELLINGHAM, WA 98226	, Occupation NONE			\$50.00	\$105.00
09/18/18	LUCY MORSE 2501 MOUNTAIN VIEW RD FERNDAL, WA 98248	ferndale community resource ferndale, WA Occupation COORDINATOR			\$50.00	\$110.00
09/18/18	PAUL ENGLESBERG 2501 MOUNTAIN VIEW RD FERNDAL, WA 98248	walden university minneapolis , MN Occupation PROFESSOR			\$50.00	\$110.00
09/18/18	TIM DOUGLAS 2114 WILLIAMS BELLINGHAM, WA 98225	city of bellingham bellingham, WA Occupation RETIRED			\$150.00	\$150.00
09/18/18	JOANN DOUGLAS 2114 WILLIAMS BELLINGHAM, WA 98225	, Occupation RETIRED			\$150.00	\$150.00
		Occupation				
		Occupation				

Page Total \$6,118.00

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100861455

09-29-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
09/25/18	a. Anonymous	\$17.00	\$307.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
09/25/18	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	\$120.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
09/25/18	KEITH ALLEX 8846 VALLEY VIEW RD CUSTER, WA 98240				\$30.00	\$30.00
	Occupation					
09/25/18	CHARLES GARGANO 822 S HILLS DR BELLINGHAM, WA 98229				\$100.00	\$100.00
	Occupation					
09/25/18	HARDIAL SANGHA 8611 DEPOT RD APT 122 LYNDEN, WA 98264				\$20.00	\$100.00
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$287.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$287.00

4. Date of Deposit

09/25/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

09-29-2018

Treasurer's Daytime Telephone No.: (360)384-0861

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100864482

10-14-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
10/13/18	a. Anonymous	\$30.00	\$337.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			\$30.00	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$30.00

4. Date of Deposit

10/13/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

10-14-2018

Treasurer's Daytime Telephone No.: (360)384-0861

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100867674

10-21-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
10/19/18	a. Anonymous	\$50.00	\$387.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
10/19/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>2</u> (persons)	\$40.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
10/19/18	SUZANNE HARRIS 1296 TEN MILE RD EVERSON, WA 98247				\$50.00	\$50.00
	Occupation					
10/19/18	JANICE WILSON 613 13 TH ST BELLINGHAM, WA 98225				\$50.00	\$50.00
	Occupation					
10/19/18	EARL HUTCHINS 1206 W HOLLY ST BELLINGHAM, WA 98225				\$100.00	\$100.00
	Occupation					
10/19/18	DIANE BERG 606 starflower ct bellingham, WA 98226				\$50.00	\$50.00
	Occupation					
10/19/18	PAUL BERG 606 starflower ct bellingham, WA 98226				\$50.00	\$50.00
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$390.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$390.00

4. Date of Deposit

10/19/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

10-21-2018

Treasurer's Daytime Telephone No.: **(360)384-0861**

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100869067

10-26-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
10/23/18	a. Anonymous	\$32.00	\$419.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
10/23/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>1</u> (persons)	\$20.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
10/23/18	PROCEEDS FROM LOW COST ,				\$5.00	\$0.00
	Occupation					
10/23/18	DIANNE FOSTER 926 MASON ST BELLINGHAM, WA 98225				\$30.00	\$90.00
	Occupation					
10/23/18	VINCENT FOSTER 926 MASON ST BELLINGHAM, WA 98225				\$30.00	\$30.00
	Occupation					
10/23/18	HAL THURSTON 2662 DONOVAN AVE. BELLINGHAM, WA 100.00				\$50.00	\$50.00
	Occupation					
10/23/18	MARY SWENSON 2662 DONOVAN AVE. BELLINGHAM, WA 100.00				\$50.00	\$250.00
	Occupation RETIRED					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$217.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$217.00

4. Date of Deposit

10/23/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

10-26-2018

Treasurer's Daytime Telephone No.: (360)384-0861

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100875086

12-03-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)

whatcom county democratic central committee

Mailing Address

po box 3095

City

bellingham, WA

Zip + 4

98227

Office Sought (candidates)

Election Date

2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
11/30/18	a. Anonymous	\$5.00	\$424.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
11/30/18	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>2</u> (persons)	\$11.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
11/30/18	NANCY SHENG 910 NORTSHORE DR BELLINGHAM, WA 98226	,			\$2.00	\$237.00
		OccupationNONE				
11/30/18	PEGGY BORGENS 5648 ORCHARD DR FERNDAL, WA 98248	, WA			\$11.00	\$130.00
		OccupationRETIRED				
11/30/18	ANDREW REDING 1522 GRANT ST BELLINGHAM, WA 98225				\$1.00	\$66.00
		Occupation				
11/30/18	CHARIS SNYDER-GILBERT 404 17TH ST LYNDEN, WA 98264	,			\$5.00	\$133.00
		OccupationRETIRED				
11/30/18	LINDA PACE 621 MARINE DR BELLINGHAM, WA 98225	,			\$5.00	\$580.00
		OccupationNONE				
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			\$40.00	*See reverse for details.
		Amount from attached pages			\$110.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$150.00

4. Date of Deposit

11/30/18

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

margaret e borgens

12-03-2018

Treasurer's Daytime Telephone No.: (360)384-0861

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.)
whatcom county democratic central committee

Deposit Date
11/30/18

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
11/30/18	BETTE KISH 5050 FESTIVAL BLVD apt c BELLINGHAM, WA 98226	Occupation			\$30.00	\$77.00
11/30/18	HOLLACE DUNN 331 california ave lorain, OH 44042	Occupation			\$30.00	\$30.00
11/30/18	JAMIE DOUGLASS 255 W BAKERVIEW RD #105 BELLINGHAM, WA 98226	, Occupation NONE			\$10.00	\$350.00
11/30/18	ANDRONETTA DOUGLASS 255 W BAKERVIEW RD #105 BELLINGHAM, WA 98226	, Occupation NONE			\$10.00	\$416.00
11/30/18	ELAINE HORNAL 527 Lyla LANE BELLINGHAM, WA 98225	Occupation			\$15.00	\$39.00
11/30/18	DOUG HORNAL 527 Lyla LANE BELLINGHAM, WA 98225	Occupation			\$15.00	\$30.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				

Page Total \$110.00



**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.pdca.wa.gov

May 16, 2019

Laura Ewan, legal counsel for Whatcom County Democratic Central Committee

Subject: Complaints filed by Glen Morgan, PDC Case 26305

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) alleging that the Whatcom County Democratic Central Committee (Committee). As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), the Whatcom County District Democratic Central Committee and its current Officers are receiving this formal written warning concerning the Committee's failure to comply with filing requirements to provide: (1) a detailed breakdown for expenditures, including the sub-vendor breakdown for reimbursements to individuals or payments made to consultants or vendors; and (2) a detailed description of the expenditure, including the number of mail pieces or yard signs printed, or station by station listing and run dates for political advertisements, during calendar years 2015, 2016, and 2017.

This formal written warning includes staff's expectation that the Whatcom County District Democratic Central Committee will timely file all future required reports of contributions and expenditures based on the accrual method, not on a cash basis. Staff also expects that the Committee will provide the expenditure details and descriptions as noted in the letter to Mr. Morgan, in addition to the timely disclosure of reportable debts and obligations, as required, 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.

Based on these facts, the PDC has dismissed the allegations listed in the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Alice Fiman
Compliance Officer

Endorsed by,
/s _____
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: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

May 16, 2019

Sent Electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Whatcom County Democratic Central Committee, PDC Case 26305

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed September 30, 2017 against the Whatcom County Democratic Central Committee.

Your complaint alleged that the Whatcom County Democratic Central Committee (Committee) may have violated: (1) RCW 42.17A.235 and .240 for failure to accurately and timely file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) and (2) RCW 42.17A.240 for failure to properly report expenditures and debts on C-4 reports, including the failure to provide proper expenditure descriptions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the Committee; and the response of Laura Ewan, legal counsel, for the Committee, submitted to the PDC and the Washington State Attorney General's Office (AGO), to determine whether the record supports a finding of one or more violations.

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

- The Whatcom County Democratic Central Committee (Committee) is a Bona Fide Political Party Committee located in Bellingham, Whatcom County, and has been registered and reporting with the PDC dating back to the 1990's.
- On January 9, 2019, the Committee filed a Committee Registration (C-1pc report) selecting the Full Reporting option and listing Andrew Reding as campaign manager and Sarah Goodin as treasurer.
- The complaint alleged the Committee failed to timely file 26 C-3 and C-4 reports during 2015, 2016 and 2017, and you attached a spreadsheet of those reports, along with alleging that numerous expenditures made by the Committee failed to provide the sub-vendor breakdown or failed to report a debt or obligation for the expenditure.

- Staff's review found that for election years 2015, 2016 and 2017, the Committee filed a total of 900 C-3 and C-4 reports, that included a number of amended reports as follows:
 1. For calendar year 2015, the Committee timely filed its initial C-4 reports for the whole year, which included the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports, and the Post-Primary and Post-General Election C-4 reports, disclosing \$97,085 in contributions received, and \$87,273 in expenditures made. In addition, the Committee timely filed C-3 reports during calendar year 2015, and the majority of the C-3 reports were filed weekly throughout the year other than the reports noted below.
 2. For calendar year 2016, the Committee timely filed its C-4 reports for the whole year, which included the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports, and the Post-Primary and Post-General Election C-4 reports, disclosing \$102,642 in contributions received, and \$94,408 in expenditures made. In addition, the Committee timely filed C-3 reports during calendar year 2016, and the majority of the C-3 reports were filed weekly throughout the year other than the reports noted below.
 3. For calendar year 2017, the Committee timely filed its C-4 reports for the whole year, which included the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports, and the Post-Primary and Post-General Election C-4 reports, disclosing \$153,659 in contributions received, and \$127,667 in expenditures made. In addition, the Committee timely filed C-3 reports during calendar year 2017, and the majority of the C-3 reports were filed weekly throughout the year other than the reports noted below.
- PDC's review found nine of the alleged 26 late filed C-3 or C-4 reports were filed by the Committee as amended C-4 reports, in which the initial C-4 report was timely filed, and the corrections were of minor errors that did not materially impact the public interest.
- The remaining alleged late filed C-3 reports included: (1) six C-3 reports disclosing only bank interest accrued for the period of between \$.09 and \$.33; (2) three C-3 reports that disclosed only one contribution on each report totaling \$10, \$50 and \$100 respectively, which were filed between three to seven days late; (3) one C-3 report totaling \$324 in contribution received from 10 contributors; and (4) five additional C-3 reports filed two to three days late.
- Staff noted that there were a number of expenditures made to individuals as reimbursements as listed in the complaint, for which a more detailed description or explanation of the goods and services provided was required, and in some instances a sub-vendor breakdown was needed as well, especially for the reimbursements made to Ms. Gwen Groden. Staff also noted there appeared to have been expenditures made that likely should have been disclosed on an earlier C-4 report as an outstanding debt or obligation.
- In her response on behalf of Committee, Ms. Ewan stated "Exhibit B alleges violations regarding the failure to report amounts paid for various charges as 'debt' on the C-4 and then presumably a filing of the satisfaction of the 'debt' on the subsequent C-4. For an organization that keeps its books on a cash basis as does the Whatcom County Democrats, such a characterization makes no sense. At its base, this is a dispute with the accounting methods used by the Whatcom County Democrats and, we believe, the overwhelming majority of groups that use a cash basis accounting method, against Mr. Morgan's preference for unnecessary use of time and pixels needed to satisfy his view of proper accounting under the regulations of the PDC."

- Ms. Ewan stated “After receiving the complaint, the Whatcom County Democrats sought guidance on sub-vendor reporting from the PDC...Comparison of the guidance from Mr. [sic] Blackhorn with our reporting of sub-vendor payments is necessary to determine if any violations have occurred. We believe such an examination will show no violation or, at most, a minor violation rather than the string of ‘habitual and willful’ violations alleged by Mr. Morgan. This review is properly within the purview of the administrative duties of the PDC. We note in passing that at least alleged violations 1-20 fall within permissible reporting as we understand Mr. [sic] Blackhorn’s advice.”
- The Committee has one prior PDC violation for PDC Case 06-302 for failing to timely file C-3 and C-4 reports in calendar years 2004 and 2005, in which a stipulated agreement was entered into at a Commission hearing.

As noted above, there were expenditures made by the Committee either as reimbursements to individuals that were Committee officers or volunteers, or payments made to consultants, vendors, or other third parties, for which it appears a more detailed description or explanation of the goods and services provided was required. Those issues are mitigated to a degree by the facts the Committee timely filed the overwhelming majority of the required C-3 and C-4 reports for calendar years 2015, 2016, and 2017, disclosing more than \$353,386 in contributions received and \$309,348 in expenditures made during this timeframe, and no violations have been found since 2006.

However, pursuant to WAC 390-37-060(1)(b), the Whatcom County District Democratic Central Committee will receive a formal written warning concerning the Committee’s failure to comply with filing requirements to provide: (1) a detailed breakdown of expenditures, including the sub-vendor breakdown for reimbursements to individuals or payments made to consultants or vendors; and (2) a detailed description of the expenditure, including the number of mail pieces or yard signs printed, or station by station listing and run dates for political advertisements.

The formal written warning will include staff’s expectation the Whatcom County District Democratic Central Committee timely file all future required reports of contributions and expenditures, including the expenditure details and descriptions listed above, and the timely disclosure of debts and obligations as required 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.

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 Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Peter Lavalley
Executive Director