



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

August 23, 2019

Delivered electronically to Roger Ferris, Treasurer, at "lmsbabcock@comcast.net"

Subject: Complaint filed by Glen Morgan, PDC Case 55052

Dear Mr. Ferris:

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 accurate disclosure of all contributions received, specifically funds that are not itemized, including anonymous funds, small contributions of \$25 or less and proceeds from low-cost fundraisers. PDC staff expects in the future that you will file in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 360-586-4560 toll-free at 1-877-601-2828, or by email at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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August 23, 2019

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding Fire Services Fund of Washington, PDC Case 55052

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 17, 2019. Your complaint alleged that Fire Services Fund of Washington, a Continuing Political Committee, may have violated RCW 42.17A.220(4) for accepting over limit anonymous contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Roger Ferris, Committee Officer; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution database, to determine whether the record supports a finding of one or more violations.

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

- On January 22, 2018, Fire Services Fund of Washington filed a C-1pc registering under the "Full Reporting" option and listing Robert Ferris as Campaign Manager.
- RCW 42.17A.220(4) states in part that "accumulated unidentified contributions ..., in excess of one percent of the total accumulated contributions received in the current calendar year, or three hundred dollars, whichever is more, may not be deposited, used, or expended, but shall be returned to the donor if his or her identity can be ascertained. If the donor cannot be ascertained, the contribution shall escheat to the state and shall be paid to the state treasurer for deposit in the state general fund."
- On its website, PDC guidance outlines the amount of anonymous contributions a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2018, Fire Services Fund of Washington accepted anonymous contributions in the amount of \$2,632, which was \$2,332 more than the allowable limit of \$300.
- In his response, Mr. Ferris stated that the \$2,632 was mistakenly disclosed as anonymous rather than as proceeds from a low-cost fundraiser raffle. The committee corrected its reports to accurately disclose the funds on an amended C-3 report electronically submitted on August 12, 2019.

Although the original C-3 report electronically submitted on December 10, 2018, inaccurately identified \$2,632 in funds received from unknown or "anonymous" sources, it appears that the error was unintentional and not done in order to mislead the public.

PDC staff is reminding Fire Services Fund of Washington about the importance of the accurate disclosure of all contribution received, specifically funds that are not itemized including anonymous funds, small contributions of \$25 or less and proceeds from low-cost fundraisers, on future PDC reports 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 [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Fire Services Fund of Washington