



**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

November 4, 2019

Delivered electronically to iaffl29@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Case 58825

Dear Thad Frater:

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, 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.

If you have questions, you may contact Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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November 4, 2019

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Spokane Firefighters PAC, PDC Case 58825

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 17, 2019. The complaint alleged the Spokane Firefighters Union PAC (Committee), a continuing political committee, may have violated RCW 42.17A.220 by failing to timely deposit contributions within five business days of receipt and RCW 42.17A.235 and .240 by failing to timely and accurately report deposits of contributions.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements, the applicable PDC reports filed by the Committee, and the response provided by Thad Frater, Committee Treasurer, to determine whether the record supports a finding of one or more violations.

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

- The Spokane Firefighters Union PAC filed a Committee Registration with the PDC on February 6, 2019, listing Tim Archer as Campaign Manager and Thad Frater as Treasurer.
- On January 10, 2019, the Committee filed its final Campaign Contribution and Expenditure (C-4) report for the 2018 election year, listing \$85,260.86 in total contributions and \$17,587.58 in total expenditures. This report listed a \$67,673.28 cash-on-hand balance.
- On February 14, 2019, the Committee filed its initial C-4 report for the 2019 election year. The report omitted the \$67,673.28 cash-on-hand carry-forward balance from 2018.
- The carry-forward balance was also omitted on C-4 reports the Committee filed March 12, April 10, May 9 and June 10, 2019.
- On a C-4 report filed July 18, 2019, the Committee reported a \$40,000 contribution to Citizens for Liberty and Labor. As this amount was larger than the Committee's cash

balance in PDC records, the Committee received an insufficient funds alert when attempting to electronically file the report.

- In his response, Frater stated “I have audited all 2019 transactions, both contributions and expenses, and find no discrepancies with those, in fact all have been reported and reflect accurately in our PDC account. All reports indicate they have been successfully filed and are marked with a green check-mark. I also have backups that correspond with each of the required reporting periods.”
- When notified of the error, Frater stated “I will take care of the amending necessary to update our account but I was curious how I would know on my end that anything is wrong in a case like this since all of my accounts and reports show accurate data?”
- Frater was then educated on what a green check-mark represents during the electronic filing process and the need to contact the PDC, and if needed, amend reports, when alerts are issued during the electronic filing process.
- Frater updated the C-4 reports on October 31, 2019.

Based on these findings staff has determined, in this instance, and due to Committee’s reporting the carry-forward balance in all 2018 reports, the alleged failure to accurately report the 2018 election year cash-on-hand balance on the initial 2019 election year C-4 reports does not amount to a violation warranting further investigation.

The Spokane Firefighters Union PAC made minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of these errors, the Spokane Firefighters Union PAC timely amended its reports, making the necessary technical corrections as requested by staff.

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

Barbara Sandahl
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For Peter Lavallee
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