



State of Washington
PUBLIC DISCLOSURE COMMISSION

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January 16, 2020

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding SeaTac Progress, PDC Case 58914

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 19, 2019. Your complaint alleged that SeaTac Progress, may have violated RCW 42.17A.205 by failing to timely and accurately file Committee Registration, to include the sponsor of the political action committee, and RCW 42.17A.235 and .240 for failure to file accurate and timely reports, including the failure to properly report the purpose of expenditures, as required by WAC 390-16-205 and WAC 390-16-037.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by SeaTac Progress (Committee); and reviewed their data in the PDC database, to determine whether the record supports a finding of one or more violations.

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

- On September 20, 2019, the Committee filed a Committee Registration (C-1pc) selecting the Full Reporting option and listing Jason Bennett and John Wyble as the Ministerial Treasurer and Campaign Manager, respectively.
- On October 5, 2019, the Committee amended its Committee Registration to include "Sponsored by John Wyble" in the name of the Committee to depict him as the sponsor of the Committee. Ten days later, on October 15, 2019, the Committee amended its Committee Registration for the second time to remove "Sponsored by John Wyble" since his contribution fell below the 80% threshold.
- RCW 42.17A.205(5) states in part that, "the name of a sponsored committee must include the name of the person who is the sponsor of the committee. If more than one person meets the definition of sponsor, the name of the committee must include the name of at least one sponsor but may include the names of other sponsors." Likewise, WAC 390-16-001A (2) states, "A sponsored political committee shall include on its C-1pc the name of at least one sponsor in the committee's name."
- The Committee identified the sponsor or included Mr. Wyble's name as the sponsor of the Committee on October 5, 2019, when his contribution surpassed the 80% threshold, thereby making him the sole sponsor of the Committee.

- On October 15, 2019, the Committee submitted an Independent Expenditure report (C-6) with a typographical error in the name of the city. Specifically, the name of the city in the address block was submitted as “City of Searac” instead of “SeaTac.” In its response to this allegation, the Committee, through its Treasurer Jason Bennett stated, “This is a typo in the address on the form.” All prior and subsequent Monetary Contribution (C-3) and Summary Full Campaign Contribution and Expenditure (C-4) reports submitted by the PAC have the correct city name.
- The mailers depicted on the C-6 listing the printers of these mailers by the Committee were not broken down on the C-6 report. However, since the Committee was also filing C-3 and (C-4) reports, the sub-vendor was properly listed on the 7-Day Pre-General C-4 report as “Capitol City Press.”
- In its response pertinent to the breakdown of expenditures related to the mailers depicted on the C- 6 report, the Committee, through its treasurer stated, the sub-vendor information is listed on the expenditure report as “Capitol City Press.” As there is only one sub-vendor, we believe we’ve filed it accurately.”
- Regarding the allegation concerning the failure to provide an accurate address for the primary contributor, the primary contributor’s address was listed as “PO Box 15 Roslyn, WA,” on the October 5, 2019 C-3 report, as opposed to his registered voting address in SeaTac, Washington. In its response to this allegation, the Committee stated, “It has never been required that we, as treasurers, list a verified registered voting address for a person’s contribution. We report the address of the account from which the donation is drawn, not the registered voting address of the donor. We reported the address that is related to the account from which the donation was drawn.”

Based on these findings, staff has determined that, in this instance, the Committee’s failure to correctly identify the name of the city as “SeaTac” instead of “Searac” does not amount to a violation warranting further investigation. The Committee made a typographical error in the name of the city on their C-6 reports but listed the name of the city correctly on all C-3 and C-4 reports, including the Last-Minute Contribution report (LMC).

However, staff is reminding the Committee about the importance of filing accurate reports in future years in accordance with the PDC laws 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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

s/ _____
Erick Agina, Compliance Officer

Endorsed by,

s/ _____
BG Sandahl, Deputy Director
Peter Lavalley, Executive Director

cc: Jason Bennett, SeaTac Progress Treasurer