



**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)**

November 12, 2019

Delivered electronically to "mrbelcpa@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 59146

Dear Safer Spokane:

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 Glen 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 timely, complete, and accurate disclosure of all expenditure details. PDC staff expects full disclosure of expenditure details in accordance with PDC laws and rules in the future.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

Fox Blackhorn  
Compliance Coordinator 2

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

November 12, 2019

Delivered electronically to “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaint regarding Safer Spokane (2), PDC Case 59146

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 23, 2019. The complaint alleged that Safer Spokane (Respondent), a 2017 single-year political committee, may have violated RCW 42.17A.220 for accepting over-limit anonymous contributions; and RCW 42.17A.240 and WAC 390-16-037 for failure to disclose the number of items printed for expenditures for political advertising.

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

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

- The matter of anonymous contributions was addressed by a Formal Written Warning issued in PDC Case 26493, and will not be re-addressed here.
- The Respondent reported a series of expenditures for printed political advertising which failed to include the number of items printed in accordance with RCW 42.17A.240 and WAC 390-16-037.
- In lieu of filing amendments to disclose these details, the Respondent submitted un-filed Summary Full Campaign Contribution and Expenditure reports (C-4 reports) as part of the response to the allegations in this matter, and the PDC is not requiring amendments to be filed for 2017 expenditure details at this time.

Based on our findings staff has determined that, in this instance, failure to disclose the number of items printed for political advertising does not amount to a violation that warrants further investigation.

PDC staff is reminding Safer Spokane about the importance of the timely, complete, and accurate disclosure of all expenditure details. PDC staff expects full disclosure of expenditure details in accordance with PDC laws and rules in the future.

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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

---

Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

---

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Safer Spokane