



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 9, 2019

Delivered electronically to “dan@danbradylaw.com”

Subject: Complaint filed by Glen Morgan, PDC Case 59232

Dear A Better Spokane (Sponsored by Standard Trust):

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.

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 pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s

Fox Blackhorn
Compliance Coordinator 2

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

December 9, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding A Better Spokane (Sponsored by Standard Trust),
PDC Case 59232

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 25, 2019. The complaint alleged that A Better Spokane (Sponsored by Standard Trust), a political committee, may have violated RCW 42.17A.240 for failure to accurately and completely disclose contributor addresses on Monetary Contribution reports (C-3 reports); and RCW 42.17A.205, RCW 42.17A.320, and WAC 390-16-011A for failure to disclose the name of Standard Trust as the sponsoring person in the committee’s name on the Political Committee Registration (Registration) and on 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; queried the Respondent’s data in the PDC contribution and expenditure database; and contacted the Central Business Park in Spokane Valley, to determine whether the record supports a finding of one or more violations.

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

- The complaint alleged that The Standard Trust is not at the address reported by the committee, the Central Business Park at “11016 E. Montgomery Drive, Ste 102, Spokane Valley, WA 99206”, along with evidence to suggest that the suite is vacant and the sign at the front of the business park with company names residing there, including Wolff Services.
- The response to the allegations provided checks from The Standard Trust with the above referenced address, and that The Standard Trust is a family fund of the Wolff family, with the contribution facilitated by Alvin Wolff, Jr.
- RCW 42.17A.205 requires the name of any sponsoring person for a committee to be listed in the name of the committee, which WAC 390-16-011A clarifies to mean the name of a person whose contributions to the committee constitute at least 80% of the committee’s total contributions in the previous twelve months.
- WAC 390-16-011A(4) requires a committee to review their contributions for a sponsor name on the date that the committee is initially organized or files its initial Registration, or on the date that falls sixty days before an election in which it participates, if the most recently filed Registration does not already include at least one current sponsor.

- RCW 42.17A.320 requires a committee to disclose its name and address, along with top contributor information, in sponsor identification on political advertising, including the name of any sponsoring person in accordance with WAC 390-16-011A.
- The Respondent participated in the General Election of 2018, but on September 7, 2018, sixty days before the elections, no contributor's total contributions equaled at least 80% of their total contributions in the preceding twelve calendar months.
- On September 17, 2018, the Respondent received a \$50,000 contribution from the Standard Trust.
- On June 7, 2019, the day sixty days before the Primary Election of 2019, this \$50,000 contribution from The Standard Trust constituted 95% of their total contributions, yet the Respondent failed to timely amend their Registration to include "(Sponsored by The Standard Trust)" at that time.
- On November 4, 2019, the Respondent amended their Registration to change the committee name to "A Better Spokane (Sponsored by The Standard Trust)" and did not make political advertising expenditures requiring disclosure of the name of the sponsored committee in sponsor identification in accordance with RCW 42.17A.320.

Based on our findings staff has determined that, in this instance, failure to accurately and completely disclose contribution and expenditure details, and to disclose the name of the committee's sponsor, do not amount to violations that warrant further investigation.

A Better Spokane (Sponsored by The Standard Trust)" made minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of these errors, A Better Spokane (Sponsored by The Standard Trust)" timely amended their 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: A Better Spokane (Sponsored by Standard Trust)