



**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

December 16, 2019

Delivered electronically to "dan@danbradylaw.com"

Subject: Complaint filed by Glen Morgan, PDC Case 59233

Dear Smart Reforms for 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).

PDC staff is reminding you about the importance of completely and accurately disclosing contribution and expenditure details, and timely disclosing sponsorship on committee registrations and political advertising. PDC staff expects you to review their filings and timely make required disclosures on reports and political advertising in the future.

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

December 16, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Smart Reforms for a Better Spokane (Sponsored by Standard Trust), PDC Case 59233

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 Smart Reforms for 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); RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205 for failure to accurately and completely disclose expenditure details, including the number of items printed for political advertising, and sub-vendors utilized by the campaign, on Summary Full Campaign Contribution and Expenditure reports (C-4 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 Respondent acknowledged errors in contributor addresses reported on C-3 reports, and amended their reports to correct a zip code and to disclose a street address on November 15, 2019.
- The Respondent amended their C-4 reports to disclose the number of items printed for political advertising on November 4, 2019.
- The Respondent amended their 21-day Pre-General C-4 report on December 5, 2019, to disclose sub-vendors utilized for an October 4, 2019, expenditure totaling \$12,500 to Go Big Media, disclosing Resonate as the sub-vendor and itemizing a placement fee paid directly to Go Big Media.
- 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 also participated in the General Election of 2019, and on April 9, 2019, the Respondent received a \$20,000 contribution from The Standard Trust, constituting 96% on September 6, 2019, sixty days before the election, 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 “Smart Reforms for a Better Spokane (Sponsored by The Standard Trust)” but failed to include the name of the sponsored committee on political advertising as required by RCW 42.17A.320.
- 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.

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.

PDC staff is reminding Smart Reforms for a Better Spokane (Sponsored by Standard Trust) about the importance of completely and accurately disclosing contribution and expenditure details, and timely disclosing sponsorship on committee registrations and political advertising. PDC staff expects Smart Reforms for a Better Spokane (Sponsored by Standard Trust) to review their filings and timely make required disclosures on reports and political advertising 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@pdc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Smart Reforms for a Better Spokane (Sponsored by Standard Trust)