



**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 15, 2019

Delivered electronically to "electmegan@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 59313

Dear Megan Dunn:

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 filing contribution and expenditure reports timely, accurately and completely. PDC staff expects in the future that you will file all contribution and expenditure reports in accordance with PDC laws and rules.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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November 15, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Megan Dunn PDC Case 59313

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 26, 2019. The complaint alleged that Megan Dunn (Respondent), a Candidate for County Council Member for Snohomish County Council may have violated RCW 42.17A.240 for failure to completely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

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:

- Pursuant to RCW 42.17A.240 the Respondent is required to accurately file C-3 and C-4 reports.
- The Respondent had C-4 reports that required detailed descriptions, including number of items, sub-vendor information and other details, as per required in RCW 42.17A.240 and WAC 390-16-037.
- The Respondent amended the C-4 reports covering the months of May through October 2019 to include required details and corrections, such as number of items and sub-vendor information, these reports were filed on October 9, 2019 and October 15, 2019.
- The Respondent amended the C-4 report on October 8, 2019 to better categorize and describe the in-kind contribution of the filing fee that was paid on their behalf in May 2019 in a good faith effort to increase transparency.
- The Respondent is a first-time candidate and was not on the August 6, 2019 Primary election ballot.
- The Respondent has no prior complaints with the PDC.

Based on our findings staff has determined that, in this instance, failure to accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign does not amount to a violation that warrants further investigation.

PDC staff is reminding Megan Dunn about the importance of the timely, complete and accurate disclosure of all contribution and expenditure activities, including the filing fee, and the timely, complete and accurate filings of all future PDC reports in accordance with the statutes 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 Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Megan Dunn