



**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.pdcca.wa.gov

November 16, 2020

Delivered electronically to tim.kestell@kiemleahagood.com and barbara@barbaramarney.com

Subject: Complaint filed by Glen Morgan, PDC Case 59542

Dear Partnering for Spokane's Future PAC:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC). As noted below in the letter, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding Partnering for Spokane's Future PAC about the importance of timely and accurately reporting expenditures and expenditure detail and PDC staff expects in the future you will timely file accurate and complete reports, in accordance with PDC laws and rules.

If you have questions, you may contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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November 16, 2020

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Partnering for Spokane's Future PAC, PDC Case 59542

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 23, 2019. The complaint alleged Partnering for Spokane's Future PAC (Committee) a 2018 election-year only committee formed to support Proposition No. 1, the City of Spokane Public Library General Obligation Bond measure, may have violated RCW 42.17A.240 by failing to timely and accurately report expenditure detail on Summary Full Campaign Contribution and Expenditure (C-4) reports.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, and the response from Ellen Robey, Deputy Treasurer for the Committee, to determine whether the record supports a finding of one or more violations.

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

- Partnering For Spokane's Future PAC filed a Committee Registration with the PDC on August 14, 2018 and amended its registration on September 6, 2018. In the amendment, Ellen Robey was noted as deputy treasurer and treasurer Tim Kestell was no longer listed as ministerial only.
- In its final C-4 report, the Committee reported \$126,345.22 in total contributions and expenditures during the 2018 campaign, with no remaining balance.
- Beginning in November 2019, Robey worked with PDC staff to answer allegations in the complaint, noting she “doesn't have the sub-vendor breakdown details regarding the 2018 Alliance Pacific expenditures on the invoices.” She did state she had reached out to Alliance Pacific to obtain more info but is waiting to hear back however the couple that run Alliance Pacific are semi-retired and travel a lot so she was not sure how long it will take. Plus, she noted Alliance Pacific may be unavailable due to upcoming holiday.
- At that time, Robey also stated she was unaware of the new requirements for expenditure detail, stating “I have worked with PDC for many years and I believe that at the time of

this campaign I submitted information with details as I have done in the past. It gave dollar information, but not the finite amounts that are being requested ie; number of signs and other details.”

- Once provided additional guidance from PDC staff, Robey was able to obtain invoices from the consultant, and provided them to the PDC. Robey then became ill in February 2020 and died in May 2020.
- Once PDC staff became aware Robey had died, staff contacted Tim Kestell and provided the Alliance Pacific invoices Robey had provided to the PDC. Kestell and Barbara Marney worked with PDC filer assistance staff to gain access to the Committee’s Online Reporting of Campaign Activities (ORCA) software.
- On November 12, 2020, the Committee completed final updates, filing four amended C-4 reports to provide the additional details, and filing the Committee’s final C-4 report to close out the campaign.

Based on these findings, and the fact the Committee made good faith efforts to comply with the reporting requirements of RCW 42.17A.240 concerning expenditures undertaken by the campaign on their C-4 reports, the public was not deprived of critical information as the dates, amounts, and purposes of the expenditures were disclosed, staff has determined, in this instance, the failure to timely and accurately report expenditure detail does not amount a violation warranting further investigation. PDC staff is reminding Partnering for Spokane's Future PAC about the importance of filing timely, accurate and complete reports in accordance with 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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director