



**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.pdca.wa.gov

January 30, 2020

Delivered electronically to Cydney Moore at "sensiblecapitolhill@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 59642

Dear Ms. Moore:

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 Mr. 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 disclosure of all expenditure activities prior to an election in which your name appears on the ballot in order to ensure transparency for the public. PDC staff expects in the future that you will timely file all future campaign activity reports in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Jennifer Hansen
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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January 30, 2020

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding Cydney Moore, PDC Case 59642

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 31, 2019. The complaint alleged that Cydney Moore, a candidate for Burien City Council in 2019, may have violated RCW 42.17A.235 & .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing expenditures political advertising, a campaign video and candidate photos.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Cydney Moore; the applicable PDC reports filed by 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:

- Cydney Moore (Elect Cydney campaign) filed a Candidate Registration (C-1 report) on January 13, 2019, declaring her candidacy for Burien City Council in 2019, and choosing the “Full Reporting” option.
- During the 2019 election, the Elect Cydney campaign created a website, a Facebook page and political advertisement, including postcards mailed to Burien residents and a video posted to the campaign Facebook page.
- The complaint included a copy of a postcard mailed to Burien residents, a photograph of Ms. Moore used in her campaign advertisement and screen captures from a video posted by Ms. Moore to her campaign Facebook page.
- The complaint alleged that production and postage costs for the mailer had not been disclosed. In addition, the complaint alleged that the video posted on the Elect Cydney campaign Facebook page and the photograph taken of Ms. Moore, were done professionally and had not been reported by the campaign as expenditures or in-kind contributions.
- On November 13, 2019 and December 10, 2019, the Elect Cydney campaign submitted amended C-4 reports to include costs for the mailer and postage in the amount of \$2,829.57 paid to Trade Printery. In her response, Ms. Moore apologized for her delay in disclosing these expenditures.
- In her response, Ms. Moore stated that her 2019 campaign has never used a professional photographer or videographer and that all of the photos and videos were produced by “skilled amateur hobbyists” who volunteered for the campaign. In addition, she stated

that the specific photo of her included as evidence in the complaint, was a “selfie” taken at a hair salon.

- RCW 42.17A.005(15)(b) identifies activities that occur during the course of a campaign that are not considered contributions including “the rendering of personal services of the sort commonly performed by volunteer campaign workers, or incidental expenses personally incurred by volunteer campaign workers not in excess of fifty dollars personally paid for by the worker” and then states that "volunteer services, for the purposes of this subsection, means services or labor for which the individual is not compensated by any person.”
- During review of the Elect Cydney campaign website, political advertisements posted online by the campaign, and the evidence provided by the complainant and respondent, staff found a consistent theme, color and style used throughout. The website includes a footer stating that it was created using Graphene Themes which can be downloaded at no cost.

Ms. Moore was a first-time candidate for public office and was the subject of a previous complaint filed during the 2019 campaign cycle. She was elected to the Burien City Council in the November 5, 2019 general election.

The response from Ms. Moore and staff’s general review of the Elect Cydney campaign website, Facebook page and political advertisement, that the campaign used volunteer services and free online options as well as paid or professional services. Ms. Moore’s response and subsequent amendments show that the expenditure for costs related to a mailer were disclosed late.

Based on our findings staff has determined that, in this instance, failure to timely file a C-4 report disclosing one expenditure for political advertisement ten days after the general election does not amount to a finding of a violation that warrants further investigation.

PDC staff is reminding Cydney Moore about the importance of the timely disclosure of all expenditure activities prior to an election in which her name appears on the ballot in order to ensure transparency for the public, and the timely filing 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Jennifer Hansen
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Cydney Moore

