



**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

December 23, 2019

Delivered electronically to "hawksbluff@rockisland.com"

Subject: Complaint filed by Glen Morgan, PDC Case 59773

Dear Yes for Homes Coalition of San Juan County:

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 providing sub-vendor breakdowns and detailed expenditure descriptions on C-4 reports. PDC staff expects that you will report this information in the future in accordance with PDC laws and rules.

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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December 23, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Yes for Homes Coalition of San Juan County, PDC Case 59773

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 Yes for Homes Coalition of San Juan County, a political committee, may have violated RCW 42.17A.240 by failing to provide sufficient expenditure details on *Summary Full Campaign Contribution and Expenditure* reports (C-4 reports) during election year 2018.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response provided by Yes for Homes Coalition of San Juan County (the "Respondent"); 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:

- RCW 42.17A.240(6) requires candidates to report the name and address of each person¹ to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by the report, including the amount, date and "purpose of each expenditure," as well as the total sum of all expenditures.
- WAC 390-16-037 states that expenditure reports "shall describe in detail" the goods and/or services provided, including the vendor to which an expenditure is made. The rule includes an example containing a numerical description (e.g. the number of brochures purchased).
- WAC 390-16-205 requires each political committee to report any expenditures, paid to a sub-vendor or other third party, by a vendor² the committee employs or retains. The rule includes examples of how vendor and sub-vendor breakdowns may appear on reports.
- The Respondent filed five C-4 reports in 2018 that appeared to lack sub-vendor breakdowns and/or expenditure details regarding signs, digital ads, printing, mailers, and advertising.

¹ "Person" includes, but is not limited to, an individual, candidate, political committee, political party, organization, governmental agency, corporation, etc.

² A vendor may include, but is not limited to, a person, agency, consultant, firm, organization, etc.

- Between 11/6/19 and 11/26/19, the PDC made three attempts to reach the Respondent by email and telephone regarding the allegation, the last of which was successful. The Respondent replied within 24 hours of being reached and, afterwards, worked closely with PDC staff to amend minor or ministerial errors on previously submitted reports.
- Per the PDC's request, the Respondent amended five of its C-4 reports from 2018 to include sub-vendor breakdowns and additional expenditure details for signs, digital ads, printing, mailers and advertising (see reports #100948590, 100948594, 100948597, 100949891, and 100949890); these reports were filed on December 11 and 13, 2019.

Based on our findings, staff has determined that, in this instance, failure to provide sub-vendor breakdowns and complete expenditure descriptions on C-4 reports does not amount to a violation that warrants further investigation.

PDC staff is reminding Yes for Homes Coalition of San Juan County about the importance of providing sub-vendor breakdowns and detailed expenditure descriptions on C-4 reports.

Yes for Homes Coalition of San Juan County made minor or ministerial errors on required reports for election year 2018, which did not materially impact the public interest. Upon being notified of these errors in 2019, Yes for Homes Coalition of San Juan County amended the 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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Yes for Homes Coalition of San Juan County