



**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

January 7, 2020

Delivered electronically to “fbenjamin.pullman@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 60299

Dear Francis Benjamin:

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.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Glen Morgan. Staff expects you to file all required reports of contributions and expenditures timely and accurately in future years. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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

Sincerely,

Endorsed by,

/s

Tabitha Townsend
Compliance Coordinator

/s

Peter Lavallee
Executive Director



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January 7, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Francis Benjamin, PDC Case 60299

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 18, 2019. The complaint alleged that Francis Benjamin (Respondent), a candidate, for City Council Member for the City of Pullman may have violated RCW 42.17A.235 and .240 for failure to timely 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 responses 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.235 and .240 the Respondent was required to timely and accurately file C-3 and C-4 reports showing all contributions (including in-kind), debts, and expenditures.
- The Respondent filed the first C-3 and C-4 reports for the 2019 election cycle on September 2, 2019, with reports.
 - being between 30 to 120 days late pursuant to the statutory requirement.
 - including incomplete descriptions.
 - lacking accuracy in the accounting.
- The Respondent amended all C-3 and C-4 reports on December 19, 2019 to correct and balance the activity undertaken by the campaign and to increase transparency.
- The Respondent’s 2019 campaign is the first full reporting campaign run by the candidate; whose previous campaigns used the mini reporting option.
- The Respondent has no prior violation with the PDC.
- The Respondent was not elected; and is not currently serving in public office.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file the C-3 and C-4 reports does not amount to a violation that warrants further investigation.

However, Pursuant to WAC 390-37-060(1)(d), Francis Benjamin will receive a formal written warning concerning failure to timely and accurately disclose all contribution and expenditures. The formal written warning will include staff’s expectation that Francis Benjamin timely and

accurately files all future required reports of contributions and expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or 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 or toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s

Tabitha Townsend
Compliance Coordinator

/s

Peter Lavalley
Executive Director

cc: Francis Benjamin