



**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

August 6, 2020

Delivered electronically to krystal4burien@gmail.com; info@argostrategies.com and jason@argostrategies.com

Subject: Complaint filed by Glen Morgan, PDC Case 72721

Dear Krystal Marx:

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, 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.

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

Sincerely,

Endorsed by,

/s

Alice Fiman
Compliance Officer

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

August 6, 2020

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Krystal Marx, PDC Case 72721

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed June 30, 2020.

The complaint alleged Krystal Marx, a 2021 candidate for Burien City Council, may have violated RCWs 42.17A.235 and .240 by failing to timely and completely disclose contributions and expenditures on Monetary Contributions (C-3) reports and Summary Full Campaign Contribution and Expenditure (C-4) reports and RCW 42.17A.555 by using public resources to promote a political campaign, specifically using her city-sponsored e-mail address on a Financial Affairs Statement (F-1).

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, and the response from Jason Bennett, Treasurer, Friends of Krystal Marx (Campaign), to determine whether the record supports a finding of one or more violations.

We found:

- Krystal Marx filed with the Public Disclosure Commission as a 2021 candidate for City of Burien City Council, with a campaign start date of May 15, 2020.
- In response, Bennett stated Argo Strategies offers its clients use of its Post Office Box and “We have cleared this with the Public Disclosure Commission several times over the years and the advice we’ve received is that if this is something that is offered to every Argo client (it is) then it is not reportable.”
- As Bennett notes above, the PDC allows this practice as the cost would be extremely low per Campaign if spread across all Argo Strategies clients, thus the PDC has not required the cost be reported as a separate expenditure for each Campaign.
- Bennett also stated in response “We have reported a debt to Argo Strategies for \$250 – that fee covers incidental reporting for our clients throughout the year. There wouldn’t be an additional expense incurred and no reporting of an additional debt to Argo would be required. Those small handful of reports would be included in that final \$250 debt owed to us. If transactions exceeded a certain level, we would incur another \$250 debt but we have not reached that threshold yet.”
- Regarding the issue of listing an entity (Argo Strategies) as a Committee Officer, Bennett stated “If the PDC requires us to list the specific consultant at Argo Strategies assigned to



**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

the race for 2021 (that hasn't yet been determined) we will amend the report. We planned to amend next year when that was assigned.”

- As the Campaign has listed Bennett as the Treasurer performing the ministerial duties and the definition of a person allows an entity, the use of Argo Strategies meets the definition under RCW 42.17A.005.
- As Bennett noted, the Campaign will update its Committee members once it begins its work for the 2021 election.
- Marx filed the noted Financial Affairs Statement (F-1) as required of a public official, not a candidate, and as such can use the e-mail address associated with duties of a public official.

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 Alice Fiman toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director