

Respondent Name
Cydney Moore
Complainant Name
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (<i>Mon, 13 Jul 2020 at 12:12 PM</i>)</p> <p>To whom it may concern,</p> <p>It has come to my attention that Cydney Moore, an elected Burien City Councilmember has, once again, violated Washington State’s campaign finance laws (RCW 42.17A). The details of these violations are as follows:</p> <p>1) Failure to provide a financial affairs statement to the Public Disclosure Commission, (Violation of RCW 42.17A.700(2), and RCW 42.17A.710)</p> <p>This candidate has failed to file a completed Financial Affairs Statement (F-1) form with the PDC. This candidate has a clear track record of violating the state’s campaign finance laws. It is clear the candidate knows that the law exists and has demonstrated at least a rudimentary effort to comply in the past. This candidate has just decided to ignore and flout the law this time around.</p> <p>I will point out that the PDC has for many years provided helpful reminder emails to candidates to provide these documents and help them comply, but this candidate has clearly decided to ignore the law this time around.</p> <p>For example, this candidate was officially reminded (see attached) by the PDC in PDC Enforcement Case #5779 when this candidate previously broke campaign finance laws. Yet, this candidate continued to break the law and ignore the reminder.</p> <p>Again, this candidate violated Washington State’s campaign finance laws last year again and was reminded, again, earlier this year in PDC Enforcement Case #59642 on January 30, 2020 when the PDC again provided a very helpful reminder (see attached) to this candidate for her failings to comply with the statute.</p> <p>Despite these two reminders from last year and earlier this year, this candidate continues to flout Washington State’s campaign finance laws and continues to ignore the statute. Now, she apparently doesn’t even bother to file her Financial Affairs statement.</p> <p>It should also be recognized that this candidate may be attempting to conceal sources of illegal funding or embarrassing corporate employment from the public which would indicate this candidate has chosen to willfully conceal this information from the public for nefarious and very questionable justifications. If this proves to be the case here, this candidate could</p>

also be sanctioned under **RCW 42.17A.750 (2)(a)**, which could lead to criminal or civil prosecution.

Please let me know if you need any additional information or evidence to support these very clear and obvious violations of Washington State's campaign finance laws by this political candidate.

Best Regards,

Glen Morgan

59642 Moore Cydney (2) Reminder Letter.pdf

170.17 KB

57779 Moore Cydney Reminder Letter.pdf

169.83 KB

What impact does the alleged violation(s) have on the public?

The public has a right to know these elected officials can follow the law, when they expect everyone else to follow the laws they impose in their capacity as lawmakers. It is strange, that even after multiple formal reminders from the PDC that this candidate still refuses to comply with the statute. The public has a right to know and this candidate has no right to conceal the truth from the public.

List of attached evidence or contact information where evidence may be found

see attached reminder letters from the PDC for previous violations this candidate has made of Washington State's campaign finance laws.

List of potential witnesses with contact information to reach them

The candidate should be adequate.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



**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 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,

Endorsed by,

/s

Jennifer Hansen
Compliance Officer

/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 Lavallee
Executive Director

cc: Cydney Moore



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November 19, 2019

Delivered electronically to Cydney Moore at “sensiblecapitolhill@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 57779

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 timely and accurately disclosing all expenditures activities, specifically including any required detail and vendor breakdown as described in WAC, and the timely and accurate disclosure of all reportable financial information on F-1 reports. PDC staff expects in the future that you will file timely and accurate campaign and personal financial affairs 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,

Endorsed by,

/s

Jennifer Hansen
Compliance Officer

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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November 19, 2019

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

Subject: Complaint regarding Cydney Moore, PDC Case 57779

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 21, 2019. The complaint alleged that Cydney Moore, a candidate for Burien City Council in 2019, may have violated: (1) RCW 42.17A.240 & WAC 390-16-037 for failure to accurately describe expenditures for printing on Summary Full Campaign Contribution and Expenditure reports (C-4 reports); and (2) RCW 42.17A.700 & .710 for failure to timely and accurately file Personal Financial Affairs Statement (F-1 report) as a candidate.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response(s) 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.
- On July 16, 2019, the Elect Cydney campaign filed a 21-day pre-primary C-4 report disclosing a \$990.90 expenditure made on July 5, 2019 to Abracadabra Printing with the description “Yard Signs.”
- The complaint alleged that the description was insufficient and not consistent with examples identified in WAC.
- In her response, Ms. Moore stated she regretted that her C-4 report failed to include adequate detail and stated that she had paid Abracadabra Printing for 100 yard signs and 45 sign posts. She later corrected the number of sign posts from 45 to 50 and included the correct information on her amended C-4.
- On October 24, 2019, the Elect Cydney campaign submitted an amended C-4 to include a more detailed description of the July expenditure for sign printing and materials.
- On January 28, 2019, Ms. Moore filed a candidate F-1 report disclosing personal financial information for the previous twelve months.
- The complaint alleged that Ms. Moore had failed to disclose all reportable income received during the twelve months prior to submitting her candidate F-1 and had failed to include board directorship(s), specifically with Burien Arts Association, and business ownership of TheJointBlog held during the same reporting period.

- In her response, Ms. Moore stated that she had no reportable income during the reporting period covered by her candidate F-1 other than what she originally disclosed and that she had “abdicated from all involvement with TheJointBlog.com in 2016.” In addition, she confirmed an amendment had been submitted to her F-1 to reflect her position as Trustee and Secretary of Burien Arts Association.
- On October 24, 2019, Ms. Moore submitted an amended F-1 to include the information regarding her position with Burien Arts Association. After receiving clarification from PDC staff, the F-1 was amended again on November 4, 2019, to include a \$1,000 grant Burien Arts Association received from the City of Burien during the reporting period.

Cydney Moore was a first-time candidate in 2019. It appears that her failure to disclose adequate descriptions for campaign expenditures on C-4 reports and her failure to disclose a reportable directorship position on her candidate F-1, was due to inexperience and general misunderstanding. Ms. Moore responded promptly to the complaint and has not previously been found in violation of PDC laws or rules.

Based on these findings staff has determined that, in this instance, failure to timely and accurately file the 21-day pre-primary C-4 report and failure to include a reportable position in an association on the candidate F-1 report, does not amount to a finding of a violation warranting further investigation.

PDC staff is reminding Ms. Moore about the importance of the timely disclosure of all expenditure activities, specifically including any required detail and vendor breakdown as prescribed in WAC, and the timely and accurate disclosure of all reportable financial information on F-1 reports in any 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@pdc.wa.gov.

Sincerely,

/s

Jennifer Hansen
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Cydney Moore