



**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

October 13, 2020

Delivered electronically to Cari Manry on behalf of Auburn Citizens for Schools at
“auburncitizens4schools@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 73816

Dear Cari Manry:

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 Auburn Citizens for Schools (ACS) about the importance of the timely and accurate disclosure of all contribution and expenditure activities, including the carry forward balances and expenditure details when required. PDC staff expects in the future that ACS will file timely and accurate campaign 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 pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed

Jennifer Hansen
Compliance Officer

Electronically signed

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcca.wa.gov

October 13, 2020

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

Subject: Complaint regarding Auburn Citizens for Schools, PDC Case 73816

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 15, 2020. The complaint alleged that Auburn Citizens for Schools (ACS), a political committee registered with the PDC in 2016 to support a bond and in 2020 to support a levy, may have violated: (1) RCW 42.17A.235 and .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing expenditures for election years 2016 & 2020; and (2) RCW 42.17A.235 and .240 for failure to timely and accurately report carry forward cash for election years 2016 & 2020.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by committee president, Cari Manry, and committee treasurer, Margaret Keller, for ACS (“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:

- On July 6, 2016, ACS filed a Committee Registration Statement (C-1pc report) registering for the November 8, 2016 general election, choosing the “Full Reporting” option and listing Kelly McDonald as Campaign Manager, Cari Manry and Alexis Rosario as co-chairs, Margaret Keller as Treasurer and Diane Jordan as Secretary. On March 4, 2020, ACS filed a C-1pc report registering for the February 8, 2020 special, choosing the “Full Reporting” option and listing Cari Manry as president and Margaret Keller as Treasurer.
- As a committee registered under the “Full Reporting” option, ACS was required to disclose contributions and expenditures for each election in which it was participating and to account for funds left over at the conclusion of a specific election to use as the beginning balance for a new election.
- The complaint included the allegation that the ending balance from the 2012 election did not match the beginning balance used for the 2016 election. Because the 2012 reports were outside of the statute of limitations for enforcement action, staff’s review did not include this portion of the complaint.
- In her response, Ms. Keller stated that she was responsible for reporting ACS’s activity for the 2016 election, that she is confident that the beginning balance of \$7,535.49 reported on the C-4 report covering June 1, 2016 to June 30, 2016 is correct, and that it reconciles with the bank balance.

- The complaint further alleges that the ending balance of \$4,480.44 reported on the C-4 report covering November 1, 2016 to November 30, 2016 submitted at the conclusion of the 2016 election was not brought forward to the beginning of the 2020 election.
- In response to the discrepancy in the carry forward from the end of 2016 to the beginning of 2020, ACS intended to submit a C-1pc choosing the “Mini Reporting” option in order to capture the limited activity between the two elections, however this was not technically possible with the PDC’s registration system. Ms. Keller stated that when the committee is not actively involved in a levy or bond, ACS has little to no financial activity and qualifies to use the “Mini Reporting” option. Ms. Keller confirmed that although the registration was not submitted timely, ACS received no more than \$500 from one source and did not raise or spend more than \$5,000.
- The complaint included allegations of late and incomplete reporting, specifically insufficient expenditure details as required by RCW 42.17A.240 and further described in WAC 390-16-037.
- In response, Cari Manry acknowledged the late and incomplete reporting and, as a result, a small number of amended C-4 reports were submitted to update expenditure details for 2016 and 2020.

It appears that the late and incomplete reporting was due to a general lack of knowledge with PDC laws, rules and reporting software, and not done to conceal the campaign activities of ACS. The committee has not been the subject of enforcement matters before the Commission and cooperated with staff to make the corrections referenced above.

As noted in the complaint, staff believes that the way ACS registered each election was partly to blame for the allegations related to the carry forward balances.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file C-4 reports disclosing the campaign activities of ACS during election years 2016 & 2020, does not amount to a finding of a violation that warrants further investigation.

PDC staff is reminding ACS about the importance of the timely and accurate disclosure of all contribution and expenditure activities, including the carry forward balances and expenditure details when required, on 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 pdcpdc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

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Barbara Sandahl
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cc: Auburn Citizens for Schools

