



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

September 28, 2020

Sent electronically to Glenn Waugh at electjohnley@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Cases 73973

Dear Mr. Waugh:

Below is a copy of an electronic letter sent to Glen Morgan concerning the complaint filed with the Public Disclosure Commission (PDC) against the Olympia Citizens for Schools (Committee).

As noted below 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 this allegation or take further enforcement action in this matter.

PDC staff is reminding the Committee about the importance of properly breaking down and describing monetary expenditure details, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205. PDC staff expects that the Committee will review all future expenditure(s) reports filed by the Committee to ensure they contain breakdowns and description of expenditure details, as required by law/rule.

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Erick Agina, Compliance Officer

s/ _____
Barbara Sandahl, Deputy Director for
Peter Lavalley, Executive Director



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September 28, 2020

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Olympia Citizens for Schools, Case 73973

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaints filed on July 13, 2020. The complaint alleged that the Olympia Citizens for Schools, a 2020 Single-Year Committee, may have violated RCW 42.17A.235 for failure to accurately and completely disclose contributions and expenditures report and RCW 42.17A.240 for failure to properly break down and describe expenditure details, as required in WAC 390-16-037 and WAC 390-16-205.

PDC staff reviewed your allegation(s); the applicable statute(s), rule(s), and reporting requirements; the C-3 and C-4 reports filed by the Olympia Citizens for Schools (Committee); and the July 29, 2020 and August 12, 2020, responses to the complaint provided by Glenn Waugh on behalf of the Committee.

Based on staff's review, we found the following:

- On November 21, 2019, the Olympia Citizens for Schools filed a Committee Registration (C-1pc) report in support of a school levy/bond in 2020 and selected the Full Reporting Option. The Committee has been filing statutory reports with the PDC since 2007.

Alleged failure to file timely Monetary Contribution (C-3) and Summary Full Campaign Contribution and Expenditure (C-4) reports (RCW 42.17A.235 and .240).

- In its responses to this allegation, received on July 29, 2020 and August 12, 2020, the Committee, by way of its treasurer, Glenn Waugh, stated... "Regarding the cash carried forward from our 2018 Levey [sic] campaign to our 2020 Levy campaign. My final C-4 report for 2018 campaign was filed on 5-6-2018 showing a cash balance of \$5,522.00. The PDC confirmation number is 100828146 (Copy Attached). My initial C-4 report for the 2020 Levy campaign, filed on 12-2-2019, indicated a carry-forward cash in the amount of \$5,534.48. This amount mistakenly included \$12.48 interest earned during the lull between the end of the 2018 campaign and the start-up of the 2020 campaign. After talking with the Scott from the PDC, I submitted on 7-29-2020, a new C-3 report with an attachment showing the \$12.48 interest as Miscellaneous receipt. On the same day I filed a new C-4 report correctly showing carry-forward and submitted five amended C-4 forms."

- Staff noted that the C-4 report showing the carry forward amount/balance of \$5,534.48 (which includes 12.48 in accrued interest) from the 2018 election year, was filed under the committee name of *Olympia Cit for Schools*, as opposed to the *Olympia Citizens for Schools*, which is the name the Committee used to file its 2020 election year statutory reports.

Alleged failure to properly break down and describe expenditure details – (RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205)

- Staff reviewed the description of the payments/expenditures made by the Committee in the months of December 2019, January 2020, and February 2020, and found expenses that lacked proper description(s) and breakdown(s) as required by the law/rule. On December 15, 2019, the Committee made a \$1,256.96 expenditure paid to *Capital City Press* for “printed yard signs.” On January 30, 2020 and February 24, 2020, the Committee paid \$2,527.52 to *Capital City Press* for “mailer to registered voters “and \$805 for “printing costs” to *NT Citizens for Schools*, respectively.” These payments/expenditures did not include the number of items printed or the number of mailers purchased. A detailed description that includes the number of items bought, including sub-vendor information/identity if applicable, should have been included in each of the Committee’s C-4 reports depicted in the months supra.
- On July 29, 2020, the Committee amended five C-4 reports and included detailed description(s) of the expenditure(s) made for each report, including the number of item(s) purchased. In its response, by way of Glenn Waugh, received on July 29, 2020, the Committee stated, “After talking with Scott regarding the alleged violations, I have submitted one amended C-3 form and five amended C-4 forms. I hope this addresses Mr. Morgan’s concerns.”

Based on these findings staff has determined that, in this instance, the Committee’s failure to properly and accurately describe the purpose of some of the expenditures made in one 2019 and two 2020 C-4 reports, does not amount to a violation warranting further investigation.

However, the Olympia Citizens for Schools Committee will receive a reminder letter concerning its failure to properly break down and describe monetary campaign expenditure details, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

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 Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Erick Agina, Compliance Officer

s/ _____
Barbara Sandahl, Deputy Director for
Peter Lavalley, Executive Director

cc: Glenn Waugh, Treasurer – Olympia Citizens for Schools