



**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

November 12, 2020

Delivered electronically to helenpricejohnson2020@gmail.com

Subject: PDC Case 78972

Dear Helen Price Johnson and Margaret Andersen:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC). As noted below in the letter, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely and accurately reporting expenditures and expenditure detail and PDC staff expects in the future you will timely file accurate and complete reports, in accordance with PDC laws and rules.

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

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
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: pdcc@pdcc.wa.gov • Website: www.pdcca.wa.gov

November 12, 2020

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Helen Price Johnson, PDC Case 78972

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 19, 2020. The complaint alleged Helen Price Johnson, a 2020 candidate for Washington State Senate from the 10th District, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately report expenditures and expenditure detail on Summary Full Campaign Contribution and Expenditure (C-4) reports.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, and the response from Margaret Andersen, Treasurer for the Committee to Elect Helen Price Johnson (Campaign) to determine whether the record supports a finding of one or more violations.

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

- On November 21, 2019, Helen Price Johnson filed with the PDC declaring candidacy for Washington State Senate from the 10th District for the 2020 election, selecting the Full Reporting Option.
- Johnson was first elected to the Island County Board of County Commissioners in 2008 and currently holds this office.
- The Campaign's most recent Summary Receipts and Expenditure (C-4) report, filed October 27, 2020 and amended October 28, 2020, listed \$645,755.01 in contributions and \$628,603.57 in expenditures during the 2020 campaign.
- Andersen responded to the PDC on October 27, 2020, stating the invoice for the cable television advertising was received by the Campaign on October 5 and paid October 14, 2020 and "The C4 dated 10/13/2020 did not include the Comcast \$150,000 invoice since it had not cleared the campaign bank account."
- Andersen also stated "The September media buy through Cerillion N4 and Comcast was made and appears on the C4 with 9/15/2020 dates" and noted "I will refile with

corrections or include the expense in question at your direction. I am concerned that my lack of understanding of the expense reporting time frames, level of detail needed in the description line versus the memo line, etc. caused these alleged violations.”

- Once provided additional guidance from PDC staff, Anderson amended the Campaign’s 21-day Pre-General Election C-4 report on October 27, 2020, listing a \$127,500 expenditure to Cerillion N4 Partners for “TV ads 10/5 to 11/2 subvendor Comcast.”

Based on these findings, and the fact the advertising was sponsored by the Candidate pictured in the advertising, with no intent to conceal sponsorship, and the expenditure was reported before the election, staff has determined, in this instance, the failure to timely and accurately report the expenditure and additional detail does not amount a violation warranting further investigation.

PDC staff is reminding Helen Price Johnson about the importance of filing timely, accurate and complete reports in accordance with PDC laws 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 Alice Fiman toll-free at 1-877-601-2828 or by e-mail at fdc@fdc.wa.gov.

Sincerely,

Endorsed by,

/s

Alice Fiman
Compliance Officer

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director