



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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October 1, 2021

Delivered electronically to "jimaferrell@comcast.net"

Subject: PDC Case 95994

Dear Jim Ferrell:

Enclosed 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 enclosed letter to Glen Morgan, 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.

However, pursuant to WAC 390-37-060(1)(d), this letter serves as a warning letter concerning the following matters:

- Your failure to timely report an expenditure to Data Graphics for \$10,150 for a mailer. The expenditure was made on June 26, 2017 but was not included on the June 1 – July 10, 2017 C-4 report, timely filed on July 11, 2017. Instead, it was reported on an amended C-4 filed six months and 14 days late on January 25, 2018, after the 2017 election.
- Your failure to timely report self-identified expenditures from 2017 totaling \$1,391.50,
- In addition, the June 1 – July 10, 2017 C-4 report did not adequately describe the expenditure to Data Graphics by disclosing the number of mailers produced.
- On the same C-4 report, staff noted a reimbursement to Stephen McNey for \$611.87 that included a description of "Expense Reimbursement" rather than disclosing the underlying vendor paid by the campaign worker and a description of what was purchased.
- On the same C-4 report, an expenditure to the Federal Way Mirror for \$3,012 included a description of "Advertising" without information about the run dates for the advertising.
- You initially failed to properly account for a decrease in cash on hand from the close of the 2017 campaign to the start of the 2021 campaign. Initially, the unaccounted-for difference was \$12,728.50. The unaccounted-for difference was reduced to \$1,187.00 following a series of amendments to C-4 reports filed for the 2017 campaign. Most of the amendments were filed on 10/21/20.
- You failed to accurately describe expenditures to vendors for signs, door hangers, and signs and stakes during the 2021 campaign. This included expenditures reported on the March 2021 C-4 report for: signs (amended to door hangers) for \$1,401.55 from Capital City Press; door hangers

purchased from NWP Consulting for \$2,395; and signs and stakes purchased from NWP Consulting for \$1,827.00. Thank you for amending your March C-4 on July 22, 2021 to include quantities for door hangers, signs, and stakes in the expenditure descriptions for vendors Capital City Press and NWP Consulting.

Staff expects you to file all required reports of contributions and expenditures in a timely manner in future years, to provide adequate expenditure descriptions in conformity with PDC laws, rules, and guidance, and to ensure your cash on hand balance matches your bank balance at the end of a campaign. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules. If you need further clarification concerning how to properly describe the purpose of expenditures, including broadcast and digital advertising expenditures, please contact PDC Filer Assistance Specialists by phone at 360-753-1111 or toll-free at 1-877-601-2828, or by sending a help desk inquiry by email to [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

If you have questions, you may contact Phil Stutzman at 360-664-8853 toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically Signed Philip E. Stutzman*

Phil Stutzman  
Compliance Officer

Endorsed by,

*Electronically Signed Peter Frey Lavalley*

Peter Frey Lavalley  
Executive Director