



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

August 18, 2021

Delivered electronically to Paula Sardinas at [Info@fmsglobalstrategies.com](mailto:Info@fmsglobalstrategies.com)

Subject: Complaint filed by Glen Morgan, PDC Case 96113

Dear Ms. Sardinas:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) on July 11, 2021.

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.

Pursuant to WAC 390-37-060(1)(d), however, this letter constitutes a formal warning to FMS Global Strategies concerning the failure to timely file the lobbying report for June 2018, disclosing lobbying activities undertaken for a client. PDC staff expects that FMS Global Strategies officers will file timely and accurate statutory lobbying reports in the future. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
Peter Lavalley, Executive Director





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August 18, 2021

Delivered electronically to Glen Morgan, at [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding FMS Global Strategies, PDC Case 96113

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 11, 2021. Your complaint alleged that FMS Global Strategies, a registered lobbyist with the PDC, may have violated RCW 42.17A.615 for failure to timely file the lobbying report for June 2018, disclosing lobbying activities undertaken for a client.

PDC staff reviewed your allegation; the applicable statute, rules, and reporting requirements; the lobbying reports filed by FMS Global Strategies; and the July 23 and 26, 2021 responses to the complaint provided by Paula Sardinas, President & CEO, on behalf of FMS Global Strategies.

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

- Paula and Albert Sardinas are both lobbyists for the lobbying firm of FMS Global Strategies. FMS Global Strategies filed reports for 2020, 2021, and prior years.
- For 2018 election year, FMS Global Strategies e-filed lobbying reports for January through June 2018. However, the June 2018 report was filed late on January 11, 2021, disclosing one client – NW Credit Union Association, showing \$9,500 paid to FMS Global Strategies to lobby.
- Staff noted that the May 2018 lobbyist report was timely filed disclosing the NW Credit Union Association paid the firm \$4,500 to lobby. While the June 2018 report was filed two years late, FMS Global Strategies had previously and timely disclosed that the same client was paying for lobbying services. The late report, however, disclosed more compensation that was originally not reported.

While staff found that FMS Global Strategies filed the June 2018 lobbying report late, the May 2018 report was timely filed disclosing the NW Credit Union Association paid \$9,500 to the firm to lobby. Additionally, FMS Global Strategies had previously disclosed that the same client (NW Credit Union Association) was paying for lobbying services.

Pursuant to WAC 390-37-060(1)(d), FMS Global Strategies will receive a formal written warning concerning its failure to file timely and accurate lobbying report for June 2018, which was filed late in January 2021. FMS

Global Strategies and its officers will be informed the Commission will consider the formal warning in deciding on further Commission action if there are future violations of PDC laws or rules related to statutory lobbying reports.

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 [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov)

Sincerely,

Endorsed by,

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
Peter Lavalley, Executive Director

cc: Paula F. Sardinias, President & CEO – FMS Global Strategies

