

## 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

April 8, 2022

Sent electronically to vernaiseal@gmail.com

Subject: Complaints filed by Glen Morgan, PDC Case 100883

Dear Verna Seal:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed November 9, 2021 with the Public Disclosure Commission (PDC) alleging violations of RCW 42.17A.710 for failure to timely and fully file financial affairs (F-1) statements for calendar years 2016 and 2017.

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter. This formal written warning comes with staff's expectation you file complete financial affairs statements in the future as required by law.

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 have questions, you may contact Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,
/s
Alice Fiman
Compliance Officer
Endorsed by,
/s
Peter Lavallee
Executive Director



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April 8, 2022

Sent electronically to glen@wethegoverned.com

Subject: Verna Seal, PDC Case 100883

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed November 9, 2021. Your complaint alleged Verna Seal violated RCW 42.17A.710 by failing to accurately file financial affairs (F-1) statements, specifically failing to list gifts on the F-1 of reimbursed travel and other expenses for seminars and other education programs attended in the years noted in the complaint.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; and the response from Verna Seal, to determine whether the record supports a finding of one or more violations.

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

- Verna Seal, a Tukwila City Council member until December 2021, traveled to conferences in 2016 and 2017 and received scholarships and reimbursement from the conference sponsor.
- The reimbursement and sponsorships were not reported on the financial affairs reports Seal filed with the PDC for those years.
- On December 1, 2021, Seal responded to the complaint, stating "I believed that this particular travel was exempted from disclosure because of the language on the PDC site (and subsequent training where I've participated)." Seal highlighted the text of the PDC site which lists "Any food, travel or education fee discount made available to you or your family members was also available to other members of the broad-based group to which you or they belonged" as an one of the circumstances where an otherwise reportable food, travel or educational occasion is exempt from reporting.
- PDC staff replied to Seal with more information, including RCW 42.17A.710 and WAC 390-24-203: Reporting of field trips and other excursions.

- Seal, with assistance from PDC staff, provided the PDC with F-1 supplements for calendar years 2016 and 2017.
- The supplements listed the required information to bring Seal's financial affairs reports into substantial compliance.
- PDC found no evidence Seal intended to conceal the amounts.

Based on these findings, staff has determined that in this instance, the failure to accurately file financial affairs statement does not amount to a finding of a violation that warrants further investigation.

However, pursuant to WAC 390-37-060(1)(d), Verna Seal will receive a formal written warning concerning the failure to comply with PDC requirements as noted in this letter.

The formal written warning will include staff's expectation that Verna Seal accurately file all future required financial affairs reports as required by law. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or 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 pdc@pdc.wa.gov.

Sincerely,
/s
Alice Fiman
Compliance Officer
Endorsed by,
/s
Peter Lavallee
Executive Director