

November 30, 2021

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to respond to a frivolous complaint filed by Glen Morgan (case #100883). Although I believe many of these accusations fall outside the statute of limitations for some of his 2016 and 2017 claims, I will address the accusations in full below.

1. At the time of the F1 filing, 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) that states:

Exemptions

There are six circumstances where an otherwise reportable food, travel or educational occasion is exempt from reporting:

1. It came from family members or friends where it is clear beyond a reasonable doubt that it was not given as part of any design to gain or maintain influence;
2. It is related to your or an immediate family member's outside business and is customary and not related to your performance as a public official
3. It is part of an exchange among officials and employees;
4. The occasion is a social event hosted or sponsored by a coworker;
5. ***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; and***
6. You or a family member returned the item to the donor within 30 days of receipt or gave it to a charitable organization within 30 days of receipt.

This travel scholarship and hotel accommodations were made available to every member of our broad-based group. If the PDC disagrees that this exemption does not apply in this case, I will gladly amend my previous F1 to account for this remedial error.

2. I believe the other conferences and expenses Mr. Morgan highlights were not reportable for the same reasons listed above. If the PDC feels differently, I will happily amend those relevant F1 forms to reflect that advice.

Thank you for the opportunity to respond to the complaint. If you have any questions, please feel free to contact me directly at 206.293.3274 or vernaiseal@gmail.com.

Sincerely,

Verna Seal