



**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)**

February 28, 2022

Sent electronically to [jlock2@msn.com](mailto:jlock2@msn.com) and [politicalpaula@gmail.com](mailto:politicalpaula@gmail.com)

Subject: Complaint filed by Glen Morgan, PDC Case 102141

Dear 38th Legislative District Democrats:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed December 29, 2021 with the Public Disclosure Commission (PDC) alleging a violation of RCW 42.17.405 for accepting and retaining over limit contributions.

As noted in the letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

Pursuant to WAC 390-37-060(1)(d), however, this letter serves as a formal written warning concerning your Committee's acceptance of an over-limit contribution as noted in the attached letter.

This warning includes staff's expectation your Committee does not accept any contributions that exceed the contribution limits in the future, 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.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Alice Fiman  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

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

February 28, 2022

Sent electronically to [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding 38th Legislative District Democrats, PDC Case 102141

Dear Glen Morgan:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed December 29, 2021. Your complaint alleged the 38th Legislative District Democrats (Committee) violated RCW 42.17.405 for accepting and retaining over limit contributions, specifically a \$10,000 contribution received November 1, 2021 from the Tulalip Tribe.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports; and the response from Jack Lockhart, Committee treasurer, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- RCW 42.17A.405 and WAC 390-05-400 prohibit non-exempt bona-fide political party committees from accepting contributions of more than \$5,500 in a calendar year from any person, except an individual, bona fide political party, or caucus political committee, unless an exempt funds account is established. Contributions to an exempt funds account of a bona fide political party committee are not subject to contribution limits in accordance with RCW 42.17A.405(15).
- In 2021, the Committee maintained both an exempt account and non-exempt account.
- On November 7, 2021, the Committee filed a Monetary Contributions (C-3) report listing a \$10,000 contribution received November 1, 2021 from the Tulalip Tribe of Indians made to its non-exempt account.
- In response to the complaint, Lockhart said he reviewed the PDC website and believed the Committee had no limits on contributions to both exempt and non-exempt accounts and provided a screen shot of the PDC website listing contribution limits.
- PDC staff then informed Lockhart he was showing the contribution limits from County or Legislative District Committees, not entities such as the Tulalip Tribe.
- Once made aware of the overlimit contribution, Lockhart stated "I can confirm we have not spent any of the \$10,000 in funds from the Tulalip Tribes. I will work with the Chair of the 38th LDD in getting a check done up for \$4,500 to the Tulalip Tribes and sent to them (so reducing the amount we received from them to \$5,500)."
- On January 19, 2022, the Committee filed an amended C-3 report listing a \$5,500 contribution from the Tulalip Tribe received November 1, 2021.

Based on these findings, and the fact the Committee's cash on hand balance never dropped below \$10,000 and it promptly refunded the contribution, staff has determined that in this instance, the Committee's acceptance of and retaining an over-limit contribution does not amount to a finding of a violation that warrants further investigation

However, pursuant to WAC 390-37-060(1)(d), the 38th Legislative District Democrats will receive a formal written warning concerning the acceptance of an over-limit contribution as noted in this letter. The formal written warning includes staff's expectation the Committee will not accept any contributions exceeding the contribution limits in the future, as required by law. The Commission will consider the formal written warning in deciding on future 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, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Alice Fiman  
Compliance Officer

Endorsed by,

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