



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

August 1, 2019

Delivered electronically to “kevinvandewege@hotmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 28239

Dear Kevin Van de Wege:

Below 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 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.

PDC staff is reminding you about the importance of about the importance of the complete and accurate disclosure of expenditure details, including sub-vendors, and the prohibition on the use of campaign funds for personal use. In the future, staff expects timely, complete, and accurate disclosure of all contribution and expenditure activity, and the use of campaign funds for only campaign-related purposes, in accordance with PDC laws and rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Endorsed by,

/s

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Fox Blackhorn  
Compliance Coordinator 2

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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August 1, 2019

Delivered electronically to “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaint regarding Kevin Van de Wege, PDC Case 28239

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 30, 2017. The complaint alleged that Kevin Van de Wege, a 2016 candidate for State Senator for Legislative District 24, may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign; RCW 42.17A.240 for failure to accurately and completely disclose debts and obligations; RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205 for failure to provide complete and detailed descriptions of expenditures, including sub-vendors; and RCW 42.17A.445 for unauthorized use of campaign funds for personal purposes.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the 2016 Committee to Elect Kevin Van de Wege (Campaign); the applicable PDC reports filed by the Campaign; and queried the Campaign’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- The complaint alleged that six C-3 reports were filed late, however all of them were filed timely in accordance with RCW 42.17A.235, and one was an amendment to a timely filed report with no change.
- The complaint provided fifty line-item expenditures that were allegedly orders placed in a reporting period prior to payment, which would have required reporting as debt under the version of RCW 42.17A.240 in effect at the time, which required reporting of any debts or obligations whose value exceeded \$50 and had been outstanding for more than 30 days, or whose value exceeded \$250 with no time limitations.
- The response provided by the campaign confirmed that many of the allegedly unreported debts, were in fact reported as debts on C-4 reports, and the remainder were for orders placed and paid in the same period, which would only be reported as expenditures in accordance with RCW 42.17A.240.
- Staff did note that the Campaign failed to provide a sub-vendor breakdown for an expenditure of \$400 to Dale Wilson for “Ad in Paper,” as required by RCW 42.17A.240 and WAC 390-16-205; staff also noted that the Campaign failed to provide the number of

items printed for a series of expenditures, as required by RCW 42.17A.240 and WAC 390-16-037.

- Candidate campaigns are prohibited by RCW 42.17A.445 from using contributions and funds of the authorized candidate committee for personal use, which includes, “[h]ome or business newspaper and periodical subscriptions,” as provided by WAC 390-16-238(4)(m), however the response from the Campaign indicated that the newspaper subscription was for six-months during election campaign of 2017.
- PDC staff requested that the Campaign make amendments to their reports to provide additional detail, and break lumped expenditures into individual line items with the dates and amount attributable to each expenditure, which the Campaign completed on July 10, 2019.
- The expenditures which lacked sub-vendor and number of items printed were timely reported; the newspaper subscription was small in proportion to the campaign’s overall contribution and expenditure activity; and the public was not deprived of critical in a time-sensitive period before elections.

Based on our findings staff has determined that, in this instance, failure to provide sufficiently detailed descriptions of expenditures undertaken by the Campaign, and misusing campaign funds to purchase a newspaper subscription, do not amount to violations warranting further investigation.

PDC staff is reminding Kevin Van de Wege about the importance of the complete and accurate disclosure of expenditure details, including sub-vendors, and the prohibition on the use of campaign funds for personal use. In the future, staff expects timely, complete, and accurate disclosure of all contribution and expenditure activity, and the use of campaign funds for only campaign-related purposes, in accordance with PDC laws and 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Kevin Van de Wege