



**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)**

June 27, 2019

Delivered electronically to "judith.smriga@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 28022

Dear 28th District Democrats:

Below is a copy of an electronic letter sent to 28th District Democrats concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to 28th District Democrats, 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 the 28th District Democrats about the importance of the timely, accurate, and complete disclosure of all contribution and expenditure activities. PDC staff expects that the 28th District Democrats will timely, accurately, and completely file all future PDC reports in accordance with the statutes 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 [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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June 27, 2019

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

Subject: Complaint regarding 28th District Democrats, PDC Case 28022

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 23, 2017. The complaint alleged that the 28th District Democrats, a bona fide political party, 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 Party Committee; and RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205 for failure to provide complete and accurate breakdowns of expenditures undertaken by the Party Committee.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by the 28th District Democrats; the applicable PDC reports filed by the Respondent; and queried the Respondent'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 28th District Democrats operated two accounts in 2016 and 2017, one exempt account operating in accordance with RCW 42.17A.405 and WAC 390-17-060, and not participating in elections; and a non-exempt account participating in elections.
- As a committee not participating in elections, the exempt account is required to file C-3 and C-4 reports on the tenth of the month in accordance with RCW 42.17A.235(3), and does not have to file on the accelerated schedule before elections as provided by RCW 42.17A.235(2), (4), and (5).
- In 2016, the exempt account filed 4 late C-3 reports, disclosing \$574 or 4.85% of total contributions in that year, 6 days late; the exempt account also filed 3 late C-4 reports in 2016, disclosing \$953 or 8.06% of total contributions in that year, and \$1001 or 9.54% of total expenditures in that year, between 1-6 days beyond the statutory deadlines of RCW 42.17A.235.
- In 2017, the exempt account filed 2 late C-3 reports, disclosing \$144 or 4.28% of total contributions in that year, between 8-10 days late; the exempt account also filed 3 late C-4 reports, disclosing \$554 or 16.45% of total contributions in that year, and \$655 or 25.63% of total expenditures in that year, between 2-8 days beyond the statutory deadlines of RCW 42.17A.235.

- The non-exempt account of the 28th District Democrats did participate in the Primary and General Elections of 2016 and 2017, and as such was required to report on the accelerated schedule before elections as provided by RCW 42.17A.235(2), (4), and (5).
- In 2016, the non-exempt account filed 5 late C-3 reports, disclosing \$11,400 or 14.26% of contributions in that year, between 5-18 days late; the non-exempt account also filed 3 late C-4 reports, disclosing \$7,500 or 9.38% of contributions, and \$10,500 or 13.22% of total expenditures in that year, between 1-6 days beyond the statutory deadlines of RCW 42.17A.235.
- In 2017, the non-exempt account filed 3 C-4 reports that disclosed \$0 in contributions or expenditures, but were required pre-election reports for a committee participating in an election, between 2-5 days beyond the statutory deadlines of RCW 42.17A.235, the public was not deprived of any critical information by late filing reports with no activity.
- The response provided by the 28th District Democrats indicated that the allegedly unreported debts presented by the complaint were all orders placed and paid in the same reporting period, which would only be reported as an expenditure in accordance with RCW 42.17A.240.
- Staff noted that there were a number of expenditures undertaken by the campaign that failed to provide sufficient breakdowns of the number of items printed as required by RCW 42.17A.240 and WAC 390-37-037, including the number of items printed, and sub-vendors utilized by the Party Committee as required by RCW 42.17A.240 and WAC 390-16-205.
- At the request of staff, the 28th District Democrats amended their C-4 reports to disclose the additional information required for expenditures undertaken by the Party Committee.
- The 28th District Democrats have taken corrective action to ensure future Compliance, including ensuring multiple Treasurers are trained and reported on the C-1pc, establishing an oversight committee, and forms and procedures to capture all required information for reimbursements.

Based on our findings staff has determined that, in this instance, failure to timely, accurately, and completely report contributions and expenditures, does not amount to a violation warranting further investigation.

PDC staff is reminding the 28th District Democrats about the importance of the timely, accurate, and complete disclosure of all contribution and expenditure activities. PDC staff expects that the 28th District Democrats will timely, accurately, and completely file all future PDC reports in accordance with the statutes 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).

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

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: 28th District Democrats