



**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 • Website: www.pdca.wa.gov

July 5, 2019

Delivered electronically to "hanna.floss@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 28017

Dear 48th District Democrats:

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 the timely disclosure of all contribution and expenditure activities, including debts, expenditure details, and sub-vendors utilized for expenditures undertaken by the Party. In the future, PDC staff expects timely, complete, and accurate filings of 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.

Sincerely,

Endorsed by,

/s

Fox Blackhorn
Compliance Coordinator 2

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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July 5, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding the 48th District Democrats, PDC Case 28017

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 22, 2017. The complaint alleged that the 48th District Democrats (Party), 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; RCW 42.17A.240 for failure to accurately and completely disclose debts and obligations; and RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205 for failure to accurately and completely provide detailed break downs of expenditures under taken by the Party.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by the Party; the applicable PDC reports filed by the Party; and queried the Party’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 Party filed two late C-4 reports in calendar year 2016, disclosing \$7,539 or 23% of total contributions in that year, and \$11,554 or 46% of expenditures in that year, between 1-4 days beyond the statutory deadline of RCW 42.17A.235.
- The Party also filed a single late C-3 report in calendar year 2017, disclosing \$939 or 5% of contributions in that year, 2 days beyond the statutory deadline of RCW 42.17A.235.
- These reports were filed shortly after their deadlines, before the General Elections in each year, and did not deprive the public of critical information in a time-sensitive period near an election.
- The complaint identified 19 expenditures alleged to be unreported debt incurred in a reporting period prior to discharge by an expenditure, and 40 expenditures alleged to have insufficient breakdowns of expenditure details, such as the number of items printed for political advertising, and sub-vendors utilized for expenditures undertaken by the Party.
- At the request of staff, the Party amended their C-4 reports to provide additional information required by RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205.

Based on our findings staff has determined that, in this instance, failure to timely file a small number of reports, and to completely and accurately report debts and expenditure details, do not amount to violations warranting further investigation.

PDC staff is reminding the 48th District Democrats about the importance of the timely disclosure of all contribution and expenditure activities, including debts, expenditure details, and sub-vendors utilized for expenditures undertaken by the Party. In the future, PDC staff expects timely, complete, and accurate filings of 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).

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@pdcc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: 48th District Democrats