



**State of Washington**

**PUBLIC DISCLOSURE COMMISSION**

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January 23, 2024

Delivered electronically to Dale Nachreiner, Treasurer, Clallam County Democratic Central Committee

Subject: Complaint filed by Glen Morgan, PDC Complaint 142043

Dale Nachreiner:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) against the Clallam County Democratic Central Committee.

In accordance with WAC 390-37-060(1)(d), PDC staff is issuing a formal written warning to the Clallam County Democratic Central Committee (Committee) concerning the requirement to timely and accurately file C-3 and C-4 reports in the future disclosing all contribution and expenditure activities undertaken. The warning includes providing the required details for expenditures and in-kind contributions, such as the number of signs produced or flyers printers; to properly reconcile the Committee's activities with the bank statements, and to ensure the correct amounts are carried forward from the end of a calendar year to the next calendar year for both the Limited and Unlimited accounts. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules.

PDC staff has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s/

Electronically Signed Kurt Young  
Compliance Officer

/s/

Electronically Signed Peter Lavalley, PDC Executive  
Director



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972



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January 23, 2024

Sent electronically to Glen Morgan

Subject: Complaint filed against Committee for the Clallam County Democratic Central Committee, PDC Case 142403

Glen Morgan:

The Public Disclosure Commission (PDC) staff has completed its review and investigation of the complaint you filed against the Clallam County Democratic Central Committee; a bona fide political party county committee registered with the PDC. The complaint alleged violations of RCW 42.17A.235 and .240 by the Clallam County Democratic Central Committee for failing to timely and accurately file contribution and expenditure reports during calendar years 2018 to the present, and to ensure the correct amounts are carried forward from the end of a calendar year to the next calendar year for both the Limited and Unlimited accounts.

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and the reporting requirements for a continuing political party committees; the Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Clallam County Democratic Central Committee (Committee) for both the Limited (Non-exempt funds account) and Unlimited accounts (Exempt funds account); the email responses and telephone communications with Dale Nachreiner, Committee Treasurer; and other relevant information, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- On December 27, 2018, the Committee filed a Committee Registration with the PDC registering as a bona fide political party county committee, selecting the Full Reporting option, and listing Anthony Corrado as Chair; Sandra Ulf as Vice-Chair; and Margaret Goette as Treasurer.
- On January 11, 2023, the Committee filed an updated Committee Registration with the PDC as a bona fide political party county committee, selecting the Full Reporting option, and listing Jennie Peterson as Chair; Paul Pickett as Vice-Chair; and Dale Nachreiner as Treasurer.
- The Committee has filed C-3 and C-4 reports with the PDC dating back to 2007 for both the Limited and Unlimited accounts. Mr. Nachreiner stated that the "complainant, when listing the number of days of the late submission, used the amended submission date, not the

original submission date when listing the days late.” The complaint also listed “a holiday as the due date, when it is PDC policy to move that date to the next business day.”

- Mr. Nachreiner stated that almost one-half of the alleged late filed C-3 and C-4 reports were not filed late, and he added that “one almost feels that the complaint was as much harassment as protecting the public right to know where money in politics comes from and is going.” He attached an Excel spreadsheet along with the Committee’s response, that was copied from the original complaint spreadsheet submitted by Mr. Morgan, and he added a column providing comments or a reply for some of the “alleged late filed reports.” In addition, he provided the following year by year summary of the activities being alleged:

**CY 2021-2023:** The complaint alleged that twenty (20) C3 or C4 submissions listed in the complaint were filed late, and Mr. Nachreiner stated the following:

1. Seven of the alleged late filed C-3 reports listed in the complaint were due on a holiday, either July 4th or Labor Day, noting that the PDC reporting dates list the next day following the holiday as the due date. He stated that all seven C-3 reports were filed on the PDC due date.
2. Six of the reports listed as late, included three C-3 reports and three C-4 reports, were initially filed on the due date, but the complainant “used amended submission date, when showing the number of days late.”
3. Four of the C-4 reports listed in the complaint were as he stated “for the special submission dates 21- or 7-days before the primary. During my tenure, Clallam County Democrats did not participate in primaries.” He added that the Committee file monthly C-4 reports by the 10<sup>th</sup> of the next month, and that all four reports were timely filed.
4. One C-3 report was for contributions that were deposited directly into the Committee bank account “from PayPal and was not discovered” until he conducted a reconciliation of the bank statements in August 2022. He stated the C-3 report was filed late and that “this was an oversight.”
5. One C-4 report was not timely filed for one of the 21-Day Pre-General Election dates, which was an oversight by the Committee. He stated “there were no contributions or expenditures activity in this account for the past few months. Zero balance.”
6. One C-3 report (Rep No #110131396) “was submitted incorrectly. A check was issued to a vendor for a security deposit that would be returned if there was no damage to a rented space for a fundraiser. The expenditures were recorded and noted as a security deposit and rental space and listed in an earlier C4. Months later, after the event, the security deposit check was returned.” He stated that the C-3 report was filed once the check had been returned.

**CY 2023:** Mr. Nachreiner stated that one C-4 report was filed 21 days late and listed \$64.78 in activity items. The C-4 report was filed late since a July 2023 monthly C-4 report was filed but the Committee had endorsed a candidate which required the filing of the 7-Day Pre-General Election C-4 report.

**CY 2022:** Mr. Nachreiner stated that six C-3 reports were filed between one to nine days late disclosing a combined \$85.14 in total contributions received.

**CY 2021:** Mr. Nachreiner stated that one C-4 report, the 21-Day Pre-Primary Election C-4 report, was filed one day late disclosing \$723.31 in Committee contribution and expenditure activities.

**CY 2020:** Mr. Nachreiner stated that three alleged C-4 reports were filed late in 2020 that included: (1) For one C-4 report the original C-4 report was timely filed on the required due date but the complainant used the date the amended C-4 report was filed; and (2) For two of the C-4

reports, the treasurer missed the 7-day pre-election C4 report deadline and the reports were filed six days late. He stated that this was an oversight on the part of the 2020 Treasurer.

**CY 2019:** Mr. Nachreiner stated that five C-3 reports were filed three to 34 days late, disclosing a combined \$280.08 in total contributions received; one C-3 report was filed 356 days late but was blank; and one C-4 report was filed two days late but disclosed no contribution or expenditure activities.

**CY 2018:** Mr. Nachreiner stated that one C-3 report was filed 99 days late and he noted in the comment's column of the spreadsheet that a "Low-cost fund raiser deposit (\$863.00) was missed but was found during a review of the Committee's bank account after the Treasurer had resigned."

Finally, concerning the remaining allegations for the final cash on hand balances for the both the Limited and Unlimited accounts, and the corresponding carryforward balances, Mr. Nachreiner stated that he reconciled the contributions and expenditures disclosed activities on C-3 and C-4 reports for both the Limited and Unlimited accounts, with the Committee bank statements and found the following:

- There were mistakes in the Unlimited account for calendar year 2021 that totaled \$1,400 and included: (1) a \$700 expenditure for Committee rent that was paid on January 8, 2021, (check #1715) and posted in Quicken but not reported in ORCA; and (2) a \$700 expenditure for Committee rent that was paid on November 1, 2021, (check #1764) and posted in Quicken but not reported in ORCA.
- There were mistakes in the Limited account for calendar year 2022 that totaled \$1,412.11 and included: (1) a \$700 expenditure for Committee rent that was paid on April 1, 2022, (check #1292) and posted in Quicken but not reported in ORCA; (2) an \$11.27 expenditure to Act Blue for processing fees that was posted to the bank account on April 9, 2021, and posted in Quicken, but not reported in ORCA; (3) a \$232.50 expenditure for the Committee's portion of the HQ utility expenses paid on May 16, 2022, posted in Quicken, but not reported in ORCA; (4) a \$234 PayPal expenditure made on May 23, 2022, was incorrectly entered and should have been listed as \$2.34; and (5) a \$700 expenditure for Committee rent that was paid on October 1, 2022, (check #1316) and posted in Quicken but not reported in ORCA.
- On December 19, 2023, Mr. Nachreiner filed amended C-4 reports for the both the Committee's Limited and Unlimited accounts disclosing the activities listed above, correcting the end of the year cash on hand balances with the carry forward amounts for the next year, and reconciling those totals with the Committee's bank statements.

Based on these findings, PDC staff found no evidence of violations that would require conducting a more formal investigation into the complaint or pursuing any further enforcement action in this instance.

In accordance with WAC 390-37-060(1)(d), PDC staff is issuing a formal written warning to the Clallam County Democratic Central Committee concerning the requirement to timely and accurately file C-3 and C-4 reports for the remainder of calendar year 2023, and for all future calendar years. The warning includes providing the required details for expenditures and in-kind contributions, such as the number of signs produced or flyers printers; to properly reconcile the Committee's activities with the bank statements, and to ensure the correct amounts are carried forward from the end of a calendar year to the next calendar year for both the Limited and Unlimited accounts.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s

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Electronically Signed Kurt Young  
Compliance Officer

/s

\_\_\_\_\_  
Electronically Signed Peter Lavalley, PDC Executive  
Director



cc: Clallam County Democratic Central Committee