



State of Washington
PUBLIC DISCLOSURE COMMISSION

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February 13, 2025

Delivered electronically to icdtres@gmail.com , icdchair@gmail.com and elintuk@aol.com

Subject: Complaints filed by Glen Morgan, PDC Case 142293

Dear Island County Democratic Political Action Committee:

Below is a copy of an electronic letter sent to Glen Morgan concerning complaints filed with the Public Disclosure Commission (PDC). As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

Island County Democratic Political Action Committee completed a *Statement of Understanding* (SOU) and paid a \$150 civil penalty in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule) on December 23, 2024. The SOU acknowledged a violation of RCW 42.17A.235(8) for failing to preserve financial records, specifically ORCA (Online Reporting of Campaign Activity) data files, for five calendar years following the year in which the transaction occurred. The signed SOU and \$150 penalty assessed resolves the committee's failure to preserve records, which prevented them from amending reports for election year 2021 and earlier.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this also serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. PDC staff expect you to timely and accurately file all required C-3 and C-4 reports disclosing the committee's contributions and expenditures in the future. The Commission will consider this formal written warning letter in deciding on further Commission action if there are future violations of PDC laws or rules.

In addition, PDC staff are reminding you about the importance of providing sufficient details on C-4 reports regarding in-kind contributions, including, but not limited to, the number of items and the candidates or committees supported or opposed (if applicable). PDC staff expect that, in the future, you will include such details on C-4 reports in accordance with PDC laws, rules, and guidance.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavallee

Peter Frey Lavallee
Executive Director



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February 13, 2025

Delivered electronically to glen@wethegoverned.com

Subject: Complaints regarding Island County Democratic Political Action Committee, PDC Case 142293

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed their review of the complaints you filed on September 10, 2023 and October 15, 2024. The complaints alleged that Island County Democratic Political Action Committee, a democratic county party continuing committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately file *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports), disclosing contributions and expenditures undertaken by the committee.

In your first complaint, you alleged 1) late reporting for election years 2019-2023; and 2) discrepancies in the dollar amounts disclosed on C-4 reports for the committee's 2021 ending balance and 2022 beginning balance, and 2022 ending balance and 2023 beginning balance. Your second complaint alleged the committee failed to provide sufficient details for an in-kind contribution disclosed on their 21-day pre-General C-4 report for 2024.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the responses provided by Island County Democratic Political Action Committee (the "Respondent"); the applicable PDC reports filed by the Respondent; and other relevant information to determine whether the record supports a finding of one or more violations.

Applicable Laws & Rules

- [RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and C-4 reports pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee's election participation¹, and their financial activity.

¹ [RCW 42.17A.005\(38\)](#) defines "participate" to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).

- Pursuant to RCW 42.17A.235(3)(a), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750².
- Pursuant to RCW 42.17A.235(10), amended C-3 and C-4 reports should be submitted within 21 days of filing the original report. If there is no pending complaint about the report being amended and it meets the conditions set forth in .235(10)(a) through (d), it is not evidence of a violation to submit an amended report within 21 days of the original report.
- Per RCW 42.17A.235(8), a committee's treasurer is required to preserve books of account, including ORCA (Online Reporting of Campaign Activity) data files, bills, receipts, and all other financial records of the campaign or political committee for no less than five calendar years following the year during which the transaction occurred, if not longer as otherwise required by law.
- Pursuant to RCW 42.17A.240(2), monetary contributions are disclosed on C-3 reports, which must include, but are not limited to: 1) the name and address of each person who contributed more than \$100³ during the period covered by the report; 2) the monetary value and date of each contribution; and 3) the aggregate value of all contributions received from each person during the campaign. "Contribution⁴," as defined, includes an in-kind contribution, which is disclosed on a C-4 report.
- Pursuant to RCW 42.17A.240(7), expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made in the aggregate of more than \$200⁵ during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures. Purpose description details should state the goods or services provided by the vendor, including the number of items purchased, identify any candidates or ballot propositions supported or opposed by the expenditure, and the name & address of any sub-vendors used. For advertising expenditures, filers should describe the type and number of ads, where they appeared or were broadcast, and when (e.g. run dates). An in-kind contribution is disclosed like an expenditure in ORCA.
- Per [RCW 42.17A.770](#), any action brought under Chapter 42.17A must be commenced within five years after the date the violation occurred.

² Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

³ Per [WAC 390-05-400](#), this dollar amount increased from \$25 to \$100 effective April 1, 2023.

⁴ [RCW 42.17A.005\(15\)\(a\)](#) defines a "contribution" to include a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, transfer of funds or anything of value, including personal and professional services for less than full consideration. [WAC 390-05-210\(1\)](#) further defines "contribution" to include, but not be limited to, furnishing services, property, or rights on an unequal basis or at less than fair market value for the purpose of assisting any candidate or political committee, and refers to the latter as an "in-kind contribution."

⁵ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- For the purpose of assessing base penalty amounts, [WAC 390-37-143\(1\)](#) states “occasion” means an “established violation” and “only violations in the last five years will be considered for the purpose of determining second and third occasions” of a violation.

Background & Findings

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

- The Respondent is a democratic county party continuing committee that first registered with the PDC in 2007. The Respondent’s C-1pc report (*Committee Registration*) was most recently updated on February 20, 2024. The committee has consistently selected the Full Reporting option on their C-1pc reports since at least 2019.
- The committee’s current Treasurer responded to your first complaint on September 19, 2023 and indicated that their former Treasurer did not file reports from December of 2022 to May of 2023 due to a lengthy illness, later resigned, and a new Treasurer had been appointed. The new (current) Treasurer said she had reached out to PDC staff on May 9, 2023 for guidance and assistance with accessing the committee’s ORCA (Online Reporting of Campaign Activity) data files and filing missed reports to restore compliance.
- On September 24, 2023, the new Treasurer said the discrepancy between the committee’s ending balance for 2021 and the starting balance for 2022 was the result of the previous Treasurer’s failure to carry forward this amount when he filed their first C-4 report for 2022. She also stated that the prior Treasurer did not reconcile the Cash Summary total on C-4 reports with the committee’s bank balances. The Treasurer indicated the committee’s bank balance as of the end of 2021 and beginning of 2022 was \$6,879.02.
- The Respondent committee submitted their written response to the complaint by email on September 26, 2023 wherein they admitted that some of their reports were filed late, and said other reports were timely filed, but later amended, which made them appear late. They said some timely reports were erroneously alleged to be late because the due date fell on a holiday. The Respondent said they are an all-volunteer organization and appreciate the PDC’s training opportunities and help in ensuring accurate reporting and compliance.
 - The response indicated that the committee’s late reports for 2023 were the result of the former Treasurer’s illness, which the new Treasurer proactively contacted the PDC to resolve, and amended reports were “proactive corrections” to restore compliance.
 - The committee said they had amended & filed all their 2022 reports to resolve the zero-dollar starting balance error for 2022 and begin 2023 reporting with the correct carry-forward balance. The committee said this error was not an intentional attempt to deceive the public or hide contributions, as your complaint alleged, but rather the result of their former Treasurer’s inexperience.
- On September 28, 2023, the new Treasurer informed the PDC that the committee no longer had access to their ORCA data files for 2021. The Treasurer reached out to PDC

staff to resolve this issue; however, access to 2021 data could not be restored without a physical back-up, which they do not have. The committee encountered the same issue with their 2019 and 2020 data.

- A Case Status Review (Initial Hearing) was held for this case on November 8, 2023. The hearing was attended remotely by the committee's current Treasurer, Margaret Andersen, their Chair, Jennifer Haase Morris, and Vice-Chair Albert Ondo.
- Throughout our investigation, the Respondent worked with PDC staff to resolve the issues alleged in the complaint, was responsive to PDC requests, and demonstrated a willingness to research and obtain the information necessary to facilitate the filing and amendment of reports for 2022 and 2023. The Treasurer also worked with PDC staff to ensure that reports for 2024, although not alleged in this complaint, were also accurate.
- On December 9, 2024, the Respondent's current Treasurer notified the PDC that the committee has implemented a new process in 2024 to improve the timeliness and accuracy of their PDC reporting, which includes 1) having a second officer review income and expense reports and reconcile them with the committee's bank balances; and 2) using Quicken software to match data reported on C-3 and C-4 reports with bank balances.
- The Respondent does not have previous warnings/violations of PDC requirements for activity that occurred within the last 5 years.
- The prior cases ([21332](#) and [28283](#)) you alleged in your complaints concerned alleged violations of RCW 42.17A.235 & .240 made in 2017 for activity that occurred 2015-2017, which is outside our 5-year statute of limitations. Furthermore, these cases were subsequently addressed under the Citizen's Action provision in RCW 42.17A.775 so the PDC did not issue a finding in these matters. Our research shows a single case was heard in Thurston County Superior Court for this matter (case no. 17-2-04836-34) and dismissed for lack of prosecution. Given the age and disposition of the prior cases, they are not considered a prior violation or a first occasion of a violation pursuant to WAC 390-37-143(1).

Allegation: Late Reporting (2019-2023)

Your complaint alleged the Respondent filed late C-3 and C-4 reports for election years 2019-2023. The committee's 2019 reports now fall outside of the five-year statute of limitations set forth in RCW 42.17A.770 for enforcement. Therefore, our findings below concern late reports submitted for the 2019 General Election through 2023:

2019 (Sept.-Dec.)

- All C-3 and C-4 reports filed for September - December were timely filed.

2020

- All C-4 reports for election year 2020 were timely filed.
- Twenty-three C-3 reports were filed 1-32 days late.

2021

- All C-4 reports for election year 2021 were filed timely.
- Three C-3 reports were filed 29-56 days late.

2022

- Five monthly C-4 reports (March - July) were filed 5-126 days late but are partially mitigated by a lack of election-related spending. The January, February and December C-4 reports alleged in the complaint were not late because the \$200⁶ reporting threshold in effect at that time was not met. The monthly October C-4 report was not late as alleged.
- Two C-3 reports were filed 7 and 127 days late respectively.

2023

- Two monthly C-4 reports (March & April) were filed 7 and 37 days late but are partially mitigated by a lack of election-related expenditures. The January and February C-4 reports alleged in the complaint were not late because the \$200 reporting threshold that was in effect at that time was not met.
- Twenty-four C-3 reports were filed 7-115 days late.

Late Reporting 2024 (Not Alleged)

- The monthly April C-4 report was filed 3 days late but is partially mitigated by a lack of election-related expenditures. The monthly February C-4 report was not late because the \$750 threshold for reporting was not met.
- 19 C-3 reports were filed 1-7 days late.

Amended Reports (2020-2023)

You alleged an additional 14 amended C-3 and C-4 reports for 2020, 2022 and 2023 were late but did not indicate what changed on these amended reports that made them late. Since the content and timing of amended reports determine whether they are late, this allegation was not addressed.

Allegation: Beginning and Ending Balance Inconsistencies (2021-2023)

Your first complaint alleged discrepancies between the dollar amounts disclosed on the following C-4 reports:

- 1) the “Total cash on hand” (line 18) ending balance on the report for December of 2021 (\$7,712.81) and the “Previous total cash and in-kind contributions” (line 1) beginning balance on the report for January of 2022, which was zero; and
- 2) the “Total cash on hand” (line 18) ending balance on the report for December of 2022, which was zero, and the “Previous total cash and in-kind contributions” (line 1) beginning balance on the report for January of 2023 (\$6,352.03).

These above inconsistencies were the result of carryforward issues on C-4 reports.

⁶ Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

- Due to a lack of access to ORCA data files for 2021, the Respondent was unable to correct their carryforward balances on C-4 reports for 2021. However, the committee did confirm, through bank records, that their ending balance for 2021 and beginning balance for 2022 was \$6,879.02. The committee subsequently amended their C-4 report for January of 2022 to disclose the correct beginning balance on line 1 ([report 110259946](#)).
- The Respondent amended all their C-4 reports for 2022 to ensure that the dollar amounts disclosed for their ending balance for 2022 and beginning balance for 2023 match. [Report 110259968](#) displays the correct ending balance of \$5,427.03 on line 18 for December of 2022, and [report 110260353](#) shows the same beginning balance on line 1 for January of 2023.

Allegation: Missing In-Kind Contribution Details (2024)

Mr. Morgan's second complaint alleged the Respondent failed to provide sufficient details for an in-kind contribution disclosed on their 21-day pre-General C-4 report for election year 2024, specifically the number of campaign signs received from Washington State Democrats on 10/8/24 and the name(s) of the candidate(s) supported by the signs.

The following C-4 report was amended to resolve the above allegation within 24 hours of being notified by the PDC:

- The 21-day pre-General C-4 report for 2024 was amended on 11/21/24 to include the number of signs (25) and the campaign supported (Harris/Walz). The report was amended again on 12/8/24 with no material changes ([report 110262572](#)).

Summary and Resolution

Mitigating factors in this case include the former Treasurer's illness, the size and sophistication of the committee, their relatively modest expenditures, and the minimal impact of noncompliance on the public. The committee also acknowledged and took responsibility for the alleged violations and the current Treasurer made a good-faith effort to resolve compliance, including consulting with PDC staff before and after the complaints were filed. Finally, it is worth noting that the committee took steps to adopt a new process to help prevent future reporting issues.

Aggravating factors include the committee's inability to amend or file reports in ORCA for 2021 or earlier due to a lack of data files.

Island County Democratic Political Action Committee completed a *Statement of Understanding* (SOU) and paid a \$150 civil penalty in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule) on December 23, 2024. The SOU acknowledged a violation of RCW 42.17A.235(8) for failing to preserve books-of-account financial records, specifically ORCA (Online Reporting of Campaign Activity) data files, for five calendar years following the year in which the transaction occurred. The signed SOU and \$150 penalty assessed resolve the committee's failure to preserve records, which prevented them from amending reports for election year 2021 and earlier.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, Island County Democratic Political Action Committee will also receive a formal written warning concerning their failure to timely disclose contribution and expenditures in years 2020-2024. The formal written warning will include PDC

staff's expectation that, in the future, Island County Democratic Political Action Committee will timely and accurately file all required C-3 and C-4 reports disclosing contributions and expenditures. The Commission will consider the formal written warning letter in deciding on further Commission action if there are future violations of PDC laws or rules.

In addition, PDC staff are also reminding Island County Democratic Political Action Committee about the importance of providing sufficient details on C-4 reports regarding in-kind contributions, including, but not limited to, the number of items and the candidates or committees supported or opposed (if applicable) in accordance with statutes, rules, and PDC guidance.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley

Peter Frey Lavalley
Executive Director

cc: Island County Democratic Political Action Committee