

Respondent Name
Citizens For Ridgefield Schools
Complainant Name
Glen Morgan
Complaint Description
<p><u>Glen Morgan</u> reported via the portal <i>a month ago (Sat, 2 Mar 2024 at 11:46 AM)</i> To whom it may concern,</p> <p>It has come to my attention, once again, that the Citizens for Ridgefield Schools PAC, consistent with past behavior, continues to violate Washington State's campaign finance laws (RCW 42.17A), and it doesn't appear anything the PDC does will convince them to stop. The details are as follows:</p> <p>Potential theft of campaign funds, misuse of campaign funds, disappearing campaign funds for possible personal use, theft, or illegal diversion to off-books contributions, weird disappearance of funds (Violation of RCW 42.17A.445, RCW 42.17A.240)</p> <p>I broke down in my junker car, and I had a few hours to burn while I waited on the side of the road for the tow truck. Fortunately, I can use my phone as a hotspot, and the signal (force?) is strong here, so I can still remain reasonably productive. Depending on how long it takes for the tow truck to get here, I figured I would catch up on filing complaints against those who refuse to follow the law. One of these regular violators is the Citizens for Ridgefield Schools PAC, which appears to be addicted to lawbreaking, and every time I check in on them, I find more violations. It doesn't have to be this way, but here we are.</p> <p>The first thing that caught my eye as I was trying to ignore the homeless camp drama as two addicts appear to fight over some garbage not far from my car (I'm trying to get this complaint filed before one of them gets extra violent or overdoses – unfortunately, I can't always control where my car breaks down – where is that tow truck anyway?). So, the first thing that caught my eye as I was reviewing this frequent flier lawbreaking crew was the obvious fact that a bunch of money appears to have gone missing.</p> <p>For example, this well-funded PAC filed their final C4 (expense report) for their 2022 campaign (See C4 Expense Report – Tracking # 110139867, attached for staff reference), on line 18, this PAC clearly reported that they had \$18,095.39 in their bank account. However, when I looked at their first C4 expense report filed for their most recent property tax levy campaign – it looks like they started out with only \$13,911.48 in the bank (See C4 Expense Report – Tracking # 110202854, attached for staff reference – note line 1). Where did the missing money go in the meantime? For the Common-core math challenged – there appears to be \$4,183.91 missing from this well-funded political PAC. What happened to it? Was it stolen? Did one of the principals in this PAC go on a bender at the Illani Casino Resort? Was it secretly used to transfer cash to a politician as dark money? Did someone go on a fentanyl purchasing spree? We can't</p>

answer this question because the money is missing, it is unaccounted for, and this crew isn't talking.

(By the way, this PAC refiled the original C4 expense report for their 2024 campaign multiple times, and while other things appeared to be changing, the opening balance in the bank account wasn't one of them, so the missing funds problems seems to very clear)

It is possible that the PDC staff may have to subpoena the bank records on this group for at least the past few years to figure out where the cash went. The public has a right to know, even if this group refuses to tell the truth or report the truth in a timely manner.

Of course, once I noticed this level of violation, I started to dig a bit deeper, and, as usual, more problems appear – almost as obvious as the flashing beacons on the State Patrol car who just pulled over to see why I was broken down on the side of the freeway and verify I don't have anything to do with the homeless camp nearby.

Okay, after I persuaded the State Patrol I wasn't running a fencing operation for the homeless camp or part of their fentanyl delivery service, and that in fact, I was just waiting for the tardy tow truck, and doing my civic duty to catch lawbreakers while I wait, I can now get back to the next series of obvious violations with this crew.

2) Failure to accurately describe expense, and the illegal concealment of required information from the public. (Violation of RCW 42.17A.240, RCW 42.17A.235 & WAC 390-16-037)

As usual, when I catch a crew like this breaking the law, particularly one that is habitually doing so over the years, it is rare that they only break one law. Often, there is a collection of laws they break, and here is a good example of this PAC choosing to conceal legally required details from the public on their expense reports. First, they are not providing the actual numbers of signs and postcards they used during the 2024 campaign, which is a clear example of a **violation of WAC 390-16-037, example B. (See PDC Report # 110202851, attached for staff reference).**

Example #1 – Postcards purchased from vendor "IGN" 2/2/2024 for \$530 – missing all legally required details – how many, etc? (**PDC Report #110202851**)

Example #2 – Signs, purchased from same vendor "IGN" on 2/2/2024 for \$5,008.38 – again, missing all legally required details, how many, etc? (**PDC Report #110202851**)

I also noticed, under a similar name, but different PAC, it looks like this group in 2022, also violated this law again as detailed below (**See PDC C4 Report # 110071505, attached for staff reference**):

Example #3 – Mailers – purchased from MinuteMan Press on 1/24/22 for \$7,178.31 – again missing all legally required details, how many, etc (**PDC Report #110071505**)

A long, disturbing history of violating the law

The bigger concern than just the lawbreaking I've detailed above, is the fact that repeatedly over the years, when I get bored, or stuck on the side of the road, like today, whenever I check on this crew, they are always breaking the law. This dark money crew has been warned in the past, based on my complaints (See **PDC Enforcement Case #54858**, my complaint attached for reference), and even last year they were fined \$150 (See **PDC Enforcement Case #122205**, my complaint and statement of understanding attached for reference). I will point out that it is highly likely that there are other violations committed by this PAC which because I am currently distracted by "homeless" people asking me for drugs, money or food right now – I'm just not able to document at this moment.

This certainly merits more attention than they have received so far, and since I tend to drive marginal vehicles and break down frequently, it is likely I'll have more time to dig into these guys in the future. In the meantime, PDC staff would be well served to track the actual funds this organization has on hand by cross-referenced subpoenaed bank records with the Line 18 reports filed on their C4s. Missing money is always concerning. The public has a right to know. Even the drug addict in the nearby camp deserves to know what this PAC is going with the campaign funds they collect – the addict may be a bit distracted right now to care, but someday, if he doesn't die of an overdose, he could turn his life around, and he will never know what this PAC and the crew who runs it are doing with the money they have taken to increase taxes on local citizens.

Clearly, based on past experience, even as recently as last year - a \$150 fine is just not enough to keep this crew on the straight and narrow and within the boundaries of the law.

Let me know if you need more information or details on this one. I'm sure they will break the law again soon, but in the meantime, this should be enough to get started.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to know if PAC officers are losing, stealing, or diverting campaign funds into secret off-the-book accounts. They also have a right to know how this PAC spends the cash they collect trying to increase local property taxes.

List of attached evidence or contact information where evidence may be found

See attached

List of potential witnesses

All officers associated with this PACp
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Citizens For Ridgefield Schools (C4RS)
Citizens For Ridgefield Schools -
PO Box 1304
Ridgefield, WA 98642

Coverage: 07/26/2022 to 08/31/2022
Final report: No
Report number: 110139867 Amends 110134638
Election year: 2022
Date submitted: 03/24/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$32,272.44
2. Cash received (Schedule A line 1).	\$1,000.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$1,000.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$33,272.44
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$9,377.49
11. Cash expenditures (Line 3 schedule A).	\$5,799.56	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$5,799.56
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$15,177.05

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$18,095.39
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$18,095.39

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Alisha Lasch - 03/24/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
08/26/2022	\$1,000.00				

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$1,000.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$0.00
08/02/2022	GOULD TIFFANY	Office supplies, furniture, staff food & beverages, etc.: office depot	\$115.98
08/10/2022	PRINTRESULTS, INC 2603 NE Cesar Chavez Blvd , Portland, OR 97212	Printing literature, fliers, postcards, etc. : 9870 postcards with postage for Levy	\$5,532.78
08/10/2022	UPTON KERRI	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps	\$150.80
			\$5,799.56

4. TOTAL EXPENDITURES: \$5,799.56

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
110071505

01-31-2022

Candidate or Committee Name (Do not abbreviate. Include full name) CITIZENS FOR RIDGEFIELD SCHOOLS			
Mailing Address PO Box 1304		City Ridgefield, WA	
Zip + 4 98642	Office Sought (Candidates)	Election Date 2022	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate?</u>
Report Period Covered 01/18/22	From (last C-4) 01/18/22 To (end of period) 01/31/22	Final Report? Yes No X	

RECEIPTS

*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$73,418.08
2. Cash received (From line 2, Schedule A)	\$	\$100.00
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$100.00
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$73,518.08
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$29,961.19
11. Total cash expenditures (From line 4, Schedule A)		\$11,607.06
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$11,607.06
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$41,568.25

CANDIDATES ONLY <table style="width:100%;"> <tr> <th></th> <th>Won</th> <th>Lost</th> <th>Unopposed</th> <th>Name not on ballot</th> </tr> <tr> <td>Primary election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>General election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> Treasurer's Daytime Telephone No.: (360) 909-3766		Won	Lost	Unopposed	Name not on ballot	Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CASH SUMMARY 18. Cash on hand (Line 8 minus line 17)	\$31,949.83
	Won	Lost	Unopposed	Name not on ballot													
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>													
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>													
19. Liabilities: (Sum of loans and debts owed)		\$0.00															
20. Balance (Surplus or deficit) (Line 18 minus line 19)		\$31,949.83															

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Michael Bomar	01/31/22

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

01/18/22

01/31/22

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
01/24/2022	\$100.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$100.00**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$53.01
01/18/22	USPS 205 N Main Ave Ridgefield, WA 98642	P	Postage costs, mail permits, purchase of stamps	\$3,531.66
01/18/22	IMAGINEERING GRAPHICS PO Box 250 La Center, WA 98629	B--	T-Shirts	\$738.00
01/24/22	GEORGIANNA JONES 28604 NE 10TH AVE RIDGEFIELD, WA 98642	OS	Volunteer food/drinks after sign waving	\$106.08
01/24/22	MINUTEMAN PRESS 7415 NE Highway 99, Unit 103 Vancouver, WA 98665	L	Printing for Mail Piece #1	\$7,178.31

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$11,607.06**



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Citizens For Ridgefield Schools (CFRS)
Citizens For Ridgefield Schools -
PO Box 1304
Ridgefield, Washington 98642

Coverage: 01/10/2024 to 01/31/2024
Final report: No
Report number: 110202854 Amends 110202853
Election year: 2024
Date submitted: 03/01/2024

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$13,911.48
2. Cash received (Schedule A line 1).	\$5,000.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$5,000.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$18,911.48
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$0.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$0.00

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$18,911.48
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$18,911.48

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Zach Smith - 03/01/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
01/16/2024	\$4,000.00	01/24/2024	\$1,000.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$5,000.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$0.00
			\$0.00	\$0.00

4. TOTAL EXPENDITURES: \$0.00



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Citizens For Ridgefield Schools (CFRS)
Citizens For Ridgefield Schools -
PO Box 1304
Ridgefield, Washington 98642

Coverage: 02/01/2024 to 02/29/2024
Final report: No
Report number: 110202851
Election year: 2024
Date submitted: 03/01/2024

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$18,911.48
2. Cash received (Schedule A line 1).	\$3,994.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$3,994.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$22,905.48
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$8,916.49	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$8,916.49
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$8,916.49

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$13,988.99
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$13,988.99

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Zach Smith - 03/01/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
02/05/2024	\$1,624.00	02/06/2024	\$870.00	02/12/2024	\$1,500.00

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$3,994.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$240.40
02/01/2024	USPS	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps		\$267.00
02/02/2024	IGN 14413 NE 10th Ave , Vancouver, WA 98685	Printing campaign signs: Large and Small Yard Signs		\$5,008.38
02/02/2024	IGN 14413 NE 10th Ave , Vancouver, WA 98685	Other advertising : Postcards		\$530.00
02/10/2024	14 Acres Winery 2411 NE 244th St , Ridgefield, WA 98642	Fundraising events and related costs: Beverages for Rally Event		\$618.04
02/15/2024	Post Office	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps		\$530.00
02/19/2024	Balloons by Carla, LLC	Fundraising events and related costs: Balloons for Rally		\$217.40
02/20/2024	IGN 14413 NE 10th Ave , Vancouver, WA 98685	Other advertising : stickers		\$380.12
02/23/2024	Sticker Mule 36 Forest Ave , Amsterdam, NY 12010	Other advertising : Stickers		\$359.80
02/25/2024	USPS	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps		\$765.35
			\$0.00	\$8,916.49

4. TOTAL EXPENDITURES: \$8,916.49



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 • Website: www.pdc.wa.gov

Statement of Understanding

Citizens for Ridgefield Schools (C4RS) PAC

PDC Case 122205

I Alisha Lasch, the authorized representative of Respondent, Citizens for Ridgefield Schools (The Committee), acknowledge as follows:

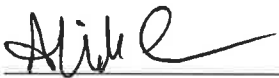
On two separate occasions, the Committee failed to timely file its Committee Registration (C-1 pc). The Committee also failed to timely file its Cash Receipts Monetary Contributions (C-3) and Summary, Full Campaign Receipts and Expenditures (C-4) reports for contributions received and expenditures undertaken by the Committee in the 2022 April and August elections. This conduct constitutes the following violations of Washington law:

- The Committee was organized on or about February 28, 2022, when it made its first expenditure in support of the April 2022 school bond. The Committee was required to file its Committee Registration (C-1 pc) no later than March 14, 2022, for the April 25, 2022, special election. It did not file its C-1 pc. This constitutes a violation of RCW 42.17A.205.
- The Committee was required to file a Committee Registration (C-1 pc) no later than May 19, 2022, for the August 2, 2022, primary election. It did not file its C-1 pc until October 17, 2022, 151 days after the deadline. This also constitutes a violation of RCW 42.17A.205.
- Beginning June 1, 2022, The Committee was required to file Cash Receipts Monetary Contribution (C-3) reports every Monday, for deposits made during the previous seven days (Monday – Sunday). In addition to the C-3 reports, The Committee was also required to file Summary, Full Report Receipts and Expenditures (C-4) report for the month of May 2022, including all the C-4 reports required during the accelerated reporting period beginning June 1 – August 31, 2022. It did not file its C-3 and C-4 reports until February 6, 2023 and March 24, 2023, 188 – 234 days after the deadline. This is a violation of RCW 42.17A.235.

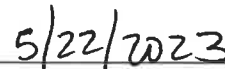
The Committee would like to avoid the time and expense of a Brief Adjudicative Proceeding (Brief Enforcement Hearing).

Therefore, in lieu of a hearing, The Committee acknowledges its violations of Washington law as described above and agrees to enter into this Statement of Understanding to resolve this matter with the Public Disclosure Commission (PDC). Further, in accordance with the Penalty Schedule set forth in WAC 390-37-143, the Committee agrees to pay a \$150 penalty for its violations of RCW 42.17A.205 and RCW 42.17A.235.

By signing this Statement of Understanding, the Committee acknowledges its violations of RCW 42.17A.205 and RCW 42.17A.235 and waives its right to a hearing in this matter. The Committee further understands that, by signing this Statement of Understanding and paying the \$150 penalty, PDC Case 122205 is resolved.



Representative of Respondent



Date Signed

The Committee shall make the \$150 penalty check or money order. Please make your check or money order payable to the “**Washington State Treasurer**” and be sure to include the PDC Case number 122205 in the memorandum field. After you sign this Statement of Understanding, please mail or deliver along with your check or money order to:

Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908



Public Disclosure Commission
Shining Light on Washington Politics Since 1972

Complaint Description

Glen Morgan (Wed, 17 Jul 2019 at 9:45 AM)

To whom it may concern,

It has come to my attention that Citizens for Ridgefield Schools PAC during the 2016 campaign session has violated Washington State's campaign finance laws (**RCW 42.17A**).

1) Accepting Illegal Over limit Anonymous Contributions (Violation of RCW 42.17A.220 (4))

This PAC violated Washington State's campaign finance laws by accepting more than \$300 in anonymous contributions from donors. Specifically, it appears that they accepted \$4,681 in anonymous contributions (apparently from one source), which is \$4,381 more than the allowable anonymous contribution limit defined in **RCW 42.17A.220 (4)**.

Upon reviewing the expenditures by this candidate's political committee, there is no evidence supporting any claim these funds were eschewed to the Treasury of the State of Washington as is required in law. Therefore this is a violation of the statute, and these funds should be immediately forfeited to the Washington State Treasury.

I have attached the relevant C3 report which provides the limited detail on the anonymous contributions received by this committee during the 2016 campaign. **This committee must forfeit \$4,381 to the Washington State Treasury immediately.** In this way, these funds can be squandered along with the rest of the general fund tax dollars, but at least this forfeiture of anonymous dark money funds may discourage others from attempting to hide their anonymous, secretive, dark money in this political campaign.

This committee should be warned about not taking secretive, dark money anonymously to fund political campaigns. This is a serious violation of Washington's State campaign finance laws and counter to the spirit and intention of transparency in the political process.

Please feel free to contact me if you have any further questions on this matter.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to have political committees who do not fund their political campaigns by secretive, anonymous dark money funding as this campaign chose to do. This campaign

must forfeit these illegal dark money funds and send them to the Washington State Treasury where they can be squandered with the rest of the General Fund. At least it will send a message to future dark money anonymous donors that their money is not welcome, even in campaigns like this one.

List of attached evidence or contact information where evidence may be found.

see attached

List of potential witnesses with contact information to reach them.

All officers and the treasurer in this PAC should be contacted

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



**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 • Website: www.pdc.wa.gov

October 7, 2019

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Citizens for Ridgefield Schools, PDC Case 54858

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 17, 2019. Your complaint alleged that the Citizens for Ridgefield Schools, may have violated RCW 42.17A.220(4) for accepting over limit anonymous contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by the Citizens for Ridgefield Schools; and reviewed their data in the PDC contribution database, to determine whether the record supports a finding of one or more violations.

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

- On November 16, 2015, the Citizens for Ridgefield Schools timely filed a Committee Registration (C-1pc report) as a Ballot Committee (Levy), selecting the Full Reporting Option, and listing Jim Maul and Tevis Laspa as Campaign Manager and Treasurer, respectively.
- RCW 42.17A.220(4) states in part that “accumulated unidentified contributions in excess of one percent of the total accumulated contributions received in the current calendar year, or three hundred dollars, whichever is more, may not be deposited, used, or expended, but shall be returned to the donor if his or her identity can be ascertained. If the donor cannot be ascertained, the contribution shall escheat to the state and shall be paid to the state treasurer for deposit in the state general fund.”
- On its website, the PDC guidance outlines the amount of anonymous contribution(s) a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2016, the Citizens for Ridgefield Schools accepted anonymous contributions in the amount of \$4,681, which is \$4,381 more than the allowable anonymous contribution limit of \$300.
- In its response to this allegation, the Citizens for Ridgefield Schools, by way of its current treasurer, Mike Bomar, stated... “I have reviewed the paperwork from our 2016 campaign, and it appears a small amount of that was from \$15 donations made at various times throughout the year. The larger sum appears to be from our January auction and fundraiser that year. Looking at our records, it is clearly a series of auction item purchases and mostly paddle raises that were paid for with cash that was lumped together, but not deposited

as individual donations. There were over 100 items in the auction.” Mr. Bomar further stated “since receiving the complaint, our committee, most of whom were not part of the group in 2016, has voted to no longer accept any anonymous donations of any amount going forward. We would also appreciate any opportunities to receive regular trainings or updates on PDC regulations so that this type of oversight does not occur in the future. We will recreate the auction in order to filter out which items were reported as cash and re-attribute to better reflect the source of the funds.”

- Staff review of the Monetary Contribution reports (C-3 reports) and the Summary Full Campaign Contribution and Expenditure reports (C-4 reports), including the amended reports filed by the Citizens for Ridgefield Schools found the committee accepted \$81 in actual anonymous contribution which is below the statutory threshold of \$300.

Based on these findings, staff has determined that, in this instance, no evidence supports a finding of a violation warranting further investigation.

However, staff is reminding the Citizens for Ridgefield Schools about the importance of filing accurate C-3 and C-4 reports in the future to reflect the actual/true source of contributions received by the committee.

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

s/ _____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director

cc: Citizens for Ridgefield Schools