

Respondent Name
Citizens for Ridgefield Schools PAC
Complainant Name
Glen Moragn
Complaint Description
<p>Glen Morgan reported via the portal (Thu, 10 Oct 2024 at 6:00 PM)</p> <p>To whom it may concern,</p> <p>It has come to my attention, once again, that the Citizens for Ridgefield Schools PAC has violated Washington State’s campaign finance laws (RCW 42.17A). The details are as follows:</p> <p>1) Failure to report legally required details on expenditure reports (Violation of RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-037)</p> <p>Once again, this crew just seems like they can’t help themselves. Specifically, they appear to be concealing from the public the number of signs and door hangers they printed when they spent \$4,496.02 at vendor “IGN” on January 7, 2024 (See PDC C4 Report# 110210219, attached for staff reference). This is an unambiguous, explicit, and clear violation of WAC 390-16-037, example B.</p> <p>A sad, unfortunate, and repetitive history of lawbreaking</p> <p>This PAC has a repeated history of lawbreaking, which is troubling to anyone who notices these things.</p> <p>Originally, In July of 2019, I caught them accepting reported overlimit anonymous contributions, which they later corrected, and the PDC gave them a reminder to help remind them to follow the law in the future (See attached Reminder letter, dated October 7, 2019 from the PDC – PDC Enforcement Case #54858).</p> <p>That reminder didn’t work, and they promptly broke down and more aggressively violated the law with late reports, failure to timely register, and overlimit anonymous contributions (later corrected), and other legal problems which resulted in a \$150 fine issued by the PDC based on my original complaint (See attached Closure Letter and SOU/Fine reference dated May 31, 2023 – PDC Enforcement Case #112205).</p> <p>The reminder letter and the \$150 fine apparently convinced this group that breaking the law is the way to run their operation, and they promptly ran afoul of the law again this year, which is why they are currently under investigation by the PDC in active Enforcement Case #151075. In this case, they are being investigated for failure to timely file reports and both myself and another watchdog filed complaints against them.</p> <p>This current complaint is just another failure to comply with the law, which only appears to be getting worse for this group the more fines and letters they receive from the PDC, which doesn’t seem to be the way it should work.</p> <p>Let me know if you want more information on this one.</p> <p>Best Regards,</p> <p>Glen</p>
What impact does the alleged violation(s) have on the public?
The public has a right to know if this crew even has the ability to pretend to follow the law - just for a year. Take it one step at a time and tell the truth about how they spend the money. It isn't too much to ask for.
List of attached evidence or contact information where evidence may be found
Attached as exhibits
List of potential witnesses with contact information to reach them

Everyone still involved, and the revolving door of past participants

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.



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

May 31, 2023

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Citizens for Ridgefield Schools PAC, PDC Case 112205

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 5, 2023. The complaint alleged that Citizens of Ridgefield Schools, a Single Election Committee in the 2022 election cycle, may have violated RCW 42.17A.220 for accepting overlimit anonymous contributions and RCW 42.17A.205, .235, and .240 for failure to timely register as a political committee and report contribution and expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements for a political party committee; the applicable C3 and C-4 reports; the reporting requirement(s) pertinent to the committee registration and anonymous/unidentified contributions statutes; and the response to the complaint received from Alicia Lasch, Treasurer, on behalf of Citizens for Ridgefield Schools PAC (Committee).

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

- On December 7, 2021, the Committee timely filed a Committee Registration (C-1pc report) as a Political Action Committee for the February 2022 special election, selecting the "Full Reporting" Option, and listing Mike Bomer as the Committee treasurer. Staff noted that the Committee participated in three elections in the 2022 election year (February special, April special, and August primary) and was required to file three separate committee registrations for each election cycle. The Committee failed to file the April special election C-1pc and filed the August primary C-1pc on October 17, 2022, 151 days after it was due.
- 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. Staff noted that the Committee did not file the required C-3 and C-4 reports until February 6, 2023, and March 24, 2023, 188 and 234 days, respectively, after the deadline.

- Regarding the alleged violation of RCW 42.17A.220, you attached a C-3 report filed by the Committee on February 6, 2023, depicting an overlimit anonymous contribution to the Committee in the amount of \$5,407. Staff review found that the new treasurer, Alisha Lasch, who took over duties of the Committee treasurer from Michael Bomer, inadvertently filed the Feb 6, 2023, C-3 report showing an overlimit anonymous contribution. The prior treasurer, Michael Bomer had already filed a C-3 report on February 3, 2022, identifying the source of the contribution and contributor as LSW Architects (C-3 report # 110071965).
- On March 14, 2023, the Committee, by way of the new Committee treasurer, Alisha Lasch, submitted a response to the complaint stating: "I took over as treasurer of this group in April 2022. When I took over the task of PDC filing requirements was never mentioned to me as part of my duties. I have no experience with PDC filings as the other organizations I have been involved in as treasurer did not have this requirement. It wasn't brought to my attention until October 2022 that I needed to be doing these filings. We had two campaigns during this time. April 2022 Bond and August 2022 levy. I submitted these filings on the information I had available and to the best of my knowledge."
- On May 26, 2023, the PDC staff received an executed Statement of Understanding (SOU) signed and dated by the Committee's treasurer, Alicia Lasch, along with a \$150 check for the penalty payment. The signed SOU acknowledged two violations of RCW 42.17A.205 for failure to timely register as a political committee and RCW 42.17A.235 for failure to timely and accurately report contributions and expenditures undertaken by the Committee during the 2022 April special and August primary election cycles.

Based on the above review, the PDC staff has determined that, in this instance, the failure to timely file the 21 and 7-Day Pre-Primary C-4 reports for the 2022 election cycles, including the failure to timely file Campaign Registrations (C-1pcs) that were required for the April special and August primary elections, do not warrant further investigation.

The Committee acknowledged the violations and took responsibility by filing the missing reports and the Committee Registration (C-1pc). The Committee also completed a SOU and paid a \$150 civil penalty.

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, Compliance Officer 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 O. Agina, Compliance Officer

s/ _____
Peter Frey Lavalley, Executive Director

cc: Alicia Lasch, Committee Treasurer



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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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



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**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

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

Coverage: 01/01/2024 to 01/31/2024
Final report: No
Report number: 110210219 Amends 110202854
Election year: 2024
Date submitted: 04/12/2024

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).		\$4,183.73
11. Cash expenditures (Line 3 schedule A).	\$8,524.86	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$8,524.86
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).		\$12,708.59

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$6,202.89
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)		\$6,202.89

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

Treasurer's name and date

Zach Smith - 04/12/2024

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
01/07/2024	IGN 14413 NE 10th Ave , Vancouver, WA 98685	Printing campaign signs: Signs and door hangers		\$4,496.02
01/07/2024	K&K Insurance 1712 Magnavox Way , Fort Wayne, IN 46804	Campaign merchandise/paraphernalia: insurance for april fundraiser event		\$430.00
01/29/2024	Instant Imprints 3521 SE 3rd Way #400 , Vancouver, WA 98684	Campaign merchandise/paraphernalia: T- shirts		\$3,598.84
			\$0.00	\$8,524.86

4. TOTAL EXPENDITURES: \$8,524.86