



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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**Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

July 31, 2019

Delivered electronically to Howard Vandermark, Chairman at "howardvandermark@yahoo.com"

Subject: Complaint filed by Glen Morgan, PDC Case 27161

Dear Mr. Vandermark:

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 Mr. 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 timely filing the C-1pc in each calendar year if the committee intends to use the "Mini Reporting" option and the importance of timely filing an amended C-1pc disclosing material changes. PDC staff expects in the future that you will submit the C-1pc timely or timely file all campaign activities when required in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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July 31, 2019

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding Adams County Democrats, PDC Case 27161

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 1, 2017. Your complaint alleged that Adams County Democrats, a bona fide county party committee, may have violated: (1) 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); or WAC 390-16-115(4) for failure to timely file a Committee Registration (C-1pc report) registering under the "Mini Reporting" option for calendar years 2009 to 2017; and (2) RCW 42.17A.205 by failing to timely file an amended C-1pc within ten days disclosing any material change in the committee information.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response(s) provided by the Committee Chair, Howard Vandermark and Committee Treasurer, Barbara Caylor; the applicable PDC reports filed by Respondent; and queried the Respondent'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:

- On January 6, 2009, Adams County Democrats filed a C-1pc registering as a bona fide county party committee for calendar year 2009, choosing the "Mini Reporting" option and listing Terry Grimmesey Janzen as Committee Chair and Barbara Caylor as Committee Treasurer.
- WAC 390-16-115(4) requires that continuing political committees, including bona fide committees, shall file a C-1pc by no later than January 31 for each year if the committee intends to use the "Mini Reporting" option.
- On July 22, 2019, Adams County Democrats submitted six (6) separate C-1pc reports registering for calendar years 2014, 2015, 2016, 2017, 2018 and 2019, and choosing the "Mini Reporting" option for each calendar year.
- The C-1pc submitted on July 22, 2019 for calendar year 2019 included a change in the committee address, email, telephone, listed Howard Vandermark as Committee Chair and Lynette Love as Vice-Chair.
- The complaint alleged that Adams County Democrats failed to timely submit the C-1pc for each calendar year since 2009 and by doing so was then required to file C-3 and C-4 reports under the "Full Reporting" option disclosing all campaign activities and that they failed to do so. RCW 42.17A.770 limits the time the Commission can commence

enforcement action to within five years. However, in response to the complaint allegations Adams County Democrats submitted amended C-1pc reports for six years.

- In response to PDC staff's request, the committee confirmed that it was eligible to use the "Mini Reporting" option for each calendar year from 2014 to the present, meaning that they had not received more than \$500 in the aggregate from one source and had not raised or spent more than \$5,000 total for each calendar year. Barbara Caylor, specifically identified a beginning balance of \$352.21 for calendar year 2018 with no deposits and \$325 in expenses, \$538 in deposits and \$25 in expenses to date for calendar year 2019.
- In his response, Howard Vandermark, stated that he is new to the committee, but that Ms. Caylor has served as treasurer/secretary since at least 2009. Mr. Vandermark stated that based on a general review of the committee's total contribution and expenses, that they are not required to file detailed reports disclosing their campaign activities.

Adams County Democrats have been registered under the "Mini Reporting" option since at least 2004. Although the committee submitted the C-1pc reports referenced above between six months and more than five years late, they did not exceed the reporting threshold for the "Mini Reporting" option and a search of the PDC website confirms that no contributions from Adams County Democrats were made during the last five years. In addition, the C-1pc submitted for calendar year 2019 was the only amendment filed disclosing material changes.

Based on these findings staff has determined that, in this instance, failure to timely file the C-1pc for calendar years 2014 to 2019, choosing the "Mini Reporting" option by no later than January 31 of each corresponding year, failure to file C-3 and C-4 reports before submitting an updated C-1pc for each year, and failure to timely file an amended C-1pc disclosing material changes, does not amount to an actual violation warranting further investigation or enforcement action.

PDC staff is reminding Adams County Democrats about the importance of the timely filing of the C-1pc in each calendar year if the committee intends to use the "Mini Reporting" option and the importance of filing an amended C-1pc disclosing material changes.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Adams County Democrats