



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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June 21, 2019

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding the Mason County Democratic Central Committee, PDC Case 27017

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 16, 2017. Your complaint alleged that the Clark County Democratic Women (Committee), a Continuing Other Political Committee, may have violated RCW 42.17A.235 by failing to timely and accurately file C-3 and C-4 reports, including the failure to properly report the purpose of expenditures, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205, and RCW 42.17A.240 by failing to timely and accurately report debt.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable C-3 and C-4 reports filed by the Committee; and the response provided by the Committee.

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

Allegation one: Failure to timely file C-3 and C-4 reports.

- PDC staff reviewed the 46 reports you attached in the spreadsheet (Exhibit A). Staff found that three of the alleged reports were amended reports that were filed timely. For the remaining 43 reports, 38 were late between one and 28 days, and the remaining five reports were between 34 and 51 days late, accounting for \$7,383.05 in contributions received and \$1,513.26 in expenditures. All the late reports were outside the accelerated reporting period, except for two reports which were between one and 19 days late, and accounted for \$1,939.45 in contributions received and \$2,588.66 in expenditures.

Allegation Two: Failure to timely and accurately report debt.

- PDC staff reviewed the 11 alleged unreported debts you attached in the spreadsheet (Exhibit B). Staff found that most of the items in your spreadsheet appear to be orders paid at the time the orders were placed, during the same reporting cycle. For example, on November 15, 2016, the Committee paid \$540 and \$360 on November 12, 2015, for July 14, 2017, for *storage locker for 1 year* and *liability insurance for 2016*, respectively. Staff also found that some items on the list (Exhibit B), should have been listed as debt on prior C4 report(s). However, you did not provide any evidence to show that any of the expenditure depicted in your spreadsheet was preceded by a promise to pay in an earlier reporting period.

Allegation Three: Failure to properly report the purpose expenditure.

- Staff reviewed the description of the 32 payments depicted on your spreadsheet (Exhibit C). Staff found that most of the payments lacked proper descriptions such as the name of the vendor and the number of items purchased as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

As noted above, staff found that there were expenditures made by the Committee either to a vendor or an individual for which a more detailed explanation or description should have been provided. Staff also noted that there were 43 reports that were reported late by the Committee. However, these deficiencies are mitigated by the fact that the Committee showed a good faith effort by amending their reports during this period to disclose additional information in the interest of transparency. Additionally, the Committee has no prior violations.

Based on these findings staff has determined that, in this instance, the failure to file timely and accurate C-3 and C-4 reports, including expenditures for debt, and the failure to properly report the purpose of expenditures, does not amount to an actual violation warranting further investigation.

However, staff is reminding the Committee about the importance of filing timely and accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the Committee, including expenditures for debt, and the importance of properly reporting the purpose of expenditures, specifically to include the number of items and sub-vendor information where applicable, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

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 erick.agina@pdc.wa.gov.

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

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

cc: Jane Roush, Treasurer for Mason County Democratic Central Committee

