



**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 Clark County Democratic Women, PDC Case 26542

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 12, 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 43 C-3 and C-4 reports you attached in the spreadsheet (Exhibit A). Staff found that two of the alleged reports were filed timely. For the remaining 41 reports, 26 reports were late between seven and 29 days and the remaining 13 reports were between 39 and 88 days late, accounting for \$2,868.49 in contributions received and \$896.00 in expenditures. Most of the late reports were outside the accelerated reporting period, except for two reports which were between 12 and 14 days late, and accounted for \$188.58 in contributions received and \$358.58 in expenditures.
- In its response to this allegation, the Committee, by way of the Committee's Treasurer, Terah Pitchford, stated, "Our organization was in a dormant state (end of 2016 and beg. of 2017). Upon re-establishment of the organization our Treasurer, Terah Pitchford, was in close contact with PDC staff to clarify details including our organization's password to ORCA. At other times, amended reports were filed in order to ensure that the most up-to-date information was always recorded with the Public Disclosure Commission."

Allegation Two: Failure to timely and accurately report debt.

- PDC staff reviewed the two alleged unreported debts you attached in the spreadsheet (Exhibit B). Staff found that both items in the spreadsheet appear to be orders paid at the time the orders were placed, during the same reporting cycle. On March 7, 2017, the Committee paid \$542 and \$324 on July 14, 2017, for *office*

supplies and *catered lunch*, respectively. Additionally, 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.

- In its response to this allegation, the Committee, by way of the Committee's Treasurer, Terah Pitchford, stated, "At no point during the time period in question did the organization incur any debts. Mr. Morgan's calculations are assumed, inaccurate and confusing. Both the expenses cited in Mr. Morgan's exhibit B were ordered and paid in the same month."

Allegation Three: Failure to properly report the purpose of one expenditure.

- Staff reviewed the description of the one payment depicted on your spreadsheet (Exhibit C). Staff found that the Committee paid \$102.00 to an individual on January 2, 2017 for *reimbursement*. Since the payment for *reimbursement* was likely for an out of pocket expense, the description lacked the name of the sub-vendor as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

As noted above, the allegations listed in your complaint concerned information disclosed on the C-3 and C-4 reports filed by the Committee. Staff noted 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 41 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 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: Terah Pitchford, Treasurer for Clark County Democratic Women