



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 6, 2025

Delivered electronically to treasurer@jeffcodemocrats.com

Subject: PDC Case 163157

Jefferson County Democrats PAC:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Glen Morgan and Conner Edwards on Oct. 16, 2024, and Jan. 29, 2025. The complaints alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately disclose contributions and expenditures on Cash Receipts Monetary Contributions (C-3) reports and Campaign Summary Receipts and Expenditures (C-4) reports, disclosing contributions and expenditures undertaken by the Jefferson County Democrats PAC during the 2024 election year.

Applicable Laws & Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.240 requires committees file accurate campaign finance reports with the Public Disclosure Commission.
- RCW 42.17A.230 allows for limited reporting of events that qualify as low-cost fundraisers.

Background & Findings

- Low-cost fundraisers are certain types of events that generate small contributions from those who attend and require limited tracking and disclosure. Rather than tracking and reporting each person who attends and how much is contributed by each, the entity reporting a low-cost fundraiser reports the event date, describes the event, and discloses the lump-sum amount received from participants who paid \$150 or less. Events qualifying as a low-cost fundraiser are listed on the [PDC website: Low-cost fundraisers](#).
- The complaint alleged Jefferson County Democrats (Committee) “attempt to conceal true source of over \$85,000 in contributions.”
- In response, the Committee provided information on low-cost fundraiser events. Contributions identified as “2024 Democrats Deliver!” were proceeds from a July 27 food and beverage event that qualified as a low-cost fundraiser.

- The Committee also noted that proceeds identified as “Campaign Headquarters” were from the sale of yard signs and campaign swag at open houses where “members and members of the public could gather to talk about the upcoming election, write postcards to voters, be trained to canvass, watch the national convention and a debate, and hold small meetings.” Items were purchased via “free-will donations.”
- PDC staff noted items sold during low-cost fundraisers must have a set price, and “pay what you can” does not qualify. In the future, the Committee is advised that the “Campaign Headquarters” fundraiser may require additional disclosure.
- PDC staff advised the Committee to add information to its reports specifically identifying the event as a low-cost fundraiser. The Committee noted they would provide this information in the future.
- In a number of its reports listing in-kind contributions, the Committee provided the name of the individual donating the items and the total contribution cost, but did not provide the name of the vendor where the contributor purchased the items. The Committee noted they were unaware the details were required but would provide this information in the future.
- The Committee noted the expenditures listed in the complaint were “generic signs supporting Democrats and democracy.” PDC staff advised the Committee the additional details regarding the purpose of the expenditures are required in the future.
- The complaint alleged expenditures reported by the Committee as being made at Amazon required additional detail, however staff noted this detail is not required.
- In response to the allegation in the complaint regarding “an additional \$2,000 worth of spending” reported on a C-4 amendment submitted in January 2025, the Committee explained that it entered the expenditure in July 2024 and could not explain why the expense didn’t get included on the original report at that time.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37-060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

Pursuant to WAC 390-37-060(1)(d), however, Jefferson County Democrats PAC are receiving a formal written warning concerning failure to accurately disclose expenditures and report contributions from the sale of campaign items. The formal written warning will include PDC staff’s expectation Jefferson County Democrats PAC timely and accurately files all future required reports of contributions and expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#). Any allegations regarding reporting for calendar year 2024 for Jefferson County Democrats that are not otherwise addressed are hereby dismissed.

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at cdc@cdc.wa.gov.

Sincerely,

Electronically signed by Alice Fiman

Alice Fiman
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Glen Morgan; Conner Edwards