



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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

Delivered electronically to Glen Morgan at [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding Dave Upthegrove, PDC Case 163220

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 24, 2024. The complaint alleged that Dave Upthegrove, a 2024 candidate for Public Lands Commissioner, may have violated RCW 42.17A.235 & .240 for failure to properly breakdown/fully describe the purpose of campaign expenditures/details on Summary, Full Report Receipts and Expenditures (C-4) reports, as required in WAC 390-16-037.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegations listed in the complaint; the applicable statutes and rules; the December 5, 2024, response to the complaint provided by Janet Miller, campaign treasurer on behalf of Dave Upthegrove (Respondent); the applicable PDC reports filed by the Respondent; and all other relevant information to determine whether the record supports a finding of one or more violations.

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

- On December 18, 2023, Dave Upthegrove filed a Candidate Registration (C-1) and selected the Full Reporting Option.
- Staff reviewed the complaint you submitted and noted that the Respondent failed to include expenditure details/proper breakdowns for some of the expenditures made by the Respondent's campaign to vendors for which a more detailed description/purpose should have been provided, such as the number/quantity of items/ads purchased by the Respondent's campaign. For example, the Committee failed to include sufficient/proper expenditure descriptions to include the sub vendor information for the media buys, how many ads were run, including the duration the ads were run (dates) for the media buys purchased on July 18, 22 and 26, 2024, payable to "Technicolor Political" for a total amount of \$360,000.
- In its response to the complaint, the Respondent's campaign treasurer, Janet Miller, stated: "Any missing details on our reports are simply an oversight or misunderstanding and not a n attempt to keep information from the public. We are anxious to rectify this quickly."

- On May 14 and June 3, 2025, the Respondent's campaign treasurer filed amended C-4 reports to better depict and correct the expenditure detail/breakdown issues raised in your complaint, including properly reporting debt.
- Any other allegations regarding reporting for the Respondent's 2024 campaign that are not addressed herein are hereby dismissed.

Based on these findings, staff has determined that, in this instance, the Respondent's failure to timely and accurately describe/breakdown the purpose of expenditures to include the sub vendor, number and duration of digital/media buy expenditures, does not amount to a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), the Respondent will receive a formal written warning concerning his failure to properly breakdown/describe the purpose of expenditures on C-4 reports in the 2024 election year. The Committee will be informed that the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules.

Accordingly, 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 toll-free at 1-877-601-2828, or by email at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

Endorsed by:

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s/\_\_\_\_\_

Erick O. Agina, Compliance Officer

Peter Frey Lavalley, Executive Director

cc: Dave Upthegrove

