



**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)**

April 17, 2019

Delivered electronically to Eric Halvorson and Jeniffer Lewis at [ehalvorson@hotmail.com](mailto:ehalvorson@hotmail.com) and [jenlew.resist@gmail.com](mailto:jenlew.resist@gmail.com)

Subject: Complaint filed by Glen Morgan, PDC Case 26307

Dear Eric Halvorson and Jeniffer Lewis

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 Glen 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 filing timely and accurate reports and forfeiting excess anonymous contributions to the State of Washington. PDC staff expects in the future that you will file timely and accurate reports and forfeit excess anonymous contributions in accordance with PDC laws and rules.

If you have questions, you may contact Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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April 17, 2019

Sent Electronically to Glen Morgan at [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: 39th Legislative District Democratic Central Committee, PDC Case 26307

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against the 39th Legislative District Democratic Central Committee on September 30, 2017.

Your complaint alleged that the 39th Legislative District Democratic Central Committee (Committee) may have violated: RCW 42.17A.245 for failure to electronically file C3 and C4 reports when expending \$5,000 or more, RCW 42.17A.235 for failure to timely and accurately file C3 and C4 reports, RCW 42.17A.220 for accepting anonymous contributions in excess of the allowable limit.

You stated in allegation (3), that your allegations were based “On information and belief” but you failed to provide any evidence to substantiate those allegations. Therefore, staff did not review this allegation.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response from Laura Ewan, legal counsel for 39th Legislative District Democratic Central Committee; and the applicable PDC reports and data in the PDC contribution and expenditure database filed by the Committee, to determine whether the record supports a finding of one or more violations.

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

- The 39th Legislative District Democratic Central Committee is a Bona Fide Political Party Committee for the 39th Legislative District, located in Monroe, Snohomish County.
- The Committee’s most recent C1-PC was filed March 3, 2017 and most recently amended Jan. 8, 2018, with the Committee choosing the Full Reporting option and listing Eric Halvorson as treasurer and Karl De Jong as chairman.

- In her response Ewan stated “the Committee acknowledges that as a result of inexperience and misunderstanding of the requirements of the Fair Campaign Practices Act (FCPA) by those responsible for the Committee’s reporting requirements during the period in question, not all reports were filed in a timely or sufficient manner. With the commencement of the new treasurer’s tenure in 2017, the Committee has addressed its shortcomings and has fulfilled its reporting requirements correctly.”
- PDC staff’s review found the Committee filed all its reports electronically for the 2017 and 2018 election years.
- In her response, Ewan also stated “RCW 42.17A.220(4) regulates accumulated unidentified contributions ‘in excess of one percent **of the total accumulated contributions received in the current calendar year**, or three hundred dollars, whichever is more...’ (emphasis added). In 2016, the Committee did not believe that the total unidentified contributions would surpass the 1% or \$300 cutoff required by law. Any excess was inadvertently retained. We have since submitted that excess to the state treasurer, as required by law, and have implemented procedures to ensure that it will not happen again.”
- The Committee reported a March 30, 2018 expenditure to the WA ST Treasurer for \$450.29 for Extra Anonymous contributions over limit 2014-2016.

Based on these findings staff has determined that, in this instance, failure to file all reports in a timely and accurate manner and the acceptance of anonymous contributions in excess of the allowable limit, does not amount to an actual violation warranting further investigation.

PDC staff is reminding the Committee about the importance of filing timely and accurate reports and forfeiting excess anonymous contributions to the State of Washington in future years in accordance with PDC laws and rules.

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 Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov)

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director