



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

February 7, 2020

Sent electronically to [chair@kitsapdemocrats.org](mailto:chair@kitsapdemocrats.org); [jwiley426@gmail.com](mailto:jwiley426@gmail.com),  
[ginger.sommerhauser@gmail.com](mailto:ginger.sommerhauser@gmail.com)

Subject: Complaint filed by Glen Morgan, PDC Case 25578

Dear Kitsap County Democratic Central Committee:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) alleging the Kitsap County Democratic Central Committee violated RCW 42.17A.235 and .240 for failure to timely and accurately report contributions, expenditures, and debt, failure to provide proper expenditure descriptions.

As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or take further enforcement action in this matter since the Kitsap County Democrat Central Committee completed a Statement of Understanding (SOU) and paid a \$300 civil penalty acknowledging violations of RCW 42.17A.235 by failing to timely file Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing expenditures undertaken by the Committee in election year 2016.

PDC staff is also hereby reminding you about the importance of complying with the filing requirements noted in the enclosed letter sent to Mr. Morgan. Staff expects you to file timely and complete reports in future years in accordance with PDC laws and rules.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

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

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Peter Lavallee  
Executive Director



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February 7, 2020

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

Subject: Kitsap County Democratic Central Committee, PDC Case 25578

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed September 19, 2017 against the Kitsap County Democratic Central Committee (Committee), a Bona Fide Political Party Committee located in Silverdale, Kitsap County.

The complaint alleged the Committee may have violated: (1) RCW 42.17A.235 and .240 for failure to accurately and timely file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports); and (2) RCW 42.17A.240 for failure to properly report expenditures and debts on C-4 reports, including the failure to provide proper expenditure descriptions.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Jeff Wiley, 2017 Chair, Kitsap County Democrats; the applicable PDC reports filed by the Committee; and data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- The Committee’s most recent C1-PC was filed January 10, 2019, with the Committee choosing the Full Reporting option and listing Johanna Baxter as campaign manager and Jennifer Chamberlin as treasurer.

**Allegation #1: Failure to timely and accurately file C-3 and C-4 reports**

- The complaint alleged the Committee failed to timely file C-3 and C-4 reports during the 2015, 2016 and 2017 election years. You attached a spreadsheet of those reports.

- In the response, Wiley acknowledged the Committee made reporting errors, however noted the Committee had four treasurers due to a combination of medical issues and a treasurer leaving mid-year for a job outside the area.

**Allegation #2: Failure to disclose debts and obligations on C-4 reports.**

- The complaint alleged that the Committee failed to disclose debts and obligations on C-4 reports and properly provide detailed breakdown descriptions of expenditures. You attached a spreadsheet of those expenditures.
- In response, the Committee stated some listed items were “just plain false and recklessly made. We paid them before we either received the service or used the venue, or they were monthly charges that would only be debt if they had been overdue, which they were not.”
- The Committee also noted they worked with PDC and have been educated on what items should have been reported as debts and amended reports noted in the complaint.
- Staff expects the Committee to timely file all future required reports and disclose debts and obligations in future years.

**Allegation #3: Failing to provide detailed expenditure information on C-4 reports**

- The complaint alleged that the Committee failed to properly provide detailed descriptions of expenditures. You attached a spreadsheet of those expenditures.
- The Committee made good faith efforts to comply with the reporting requirements of RCW 42.17A.240 concerning expenditures undertaken by the campaign on their C-4 reports. The public was not deprived of critical information as the dates, amounts, and purposes of the expenditures were disclosed.
- In response to a request from the PDC, the Committee updated its 2016 C-4 reports in March 2019 to provide additional detail.

As noted above, the Committee acknowledged the violation. In addition, (1) many of the late reports included limited direct contributions to candidates or ballot measures, and (2) the Committee filed reports in 2017 and 2018 timely during critical periods before and after an election.

The Kitsap County Democrat Central Committee completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 for failing to timely file the C-4 reports in 2016. The \$300 penalty assessed in this matter resolves the allegations listed in your complaint.

PDC staff is also reminding the Committee to properly report expenditures and debts on C-4 reports, including providing proper expenditure descriptions.

Based on the above findings and the SOU, staff has determined that, in this instance, this matter does not warrant further investigation. 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 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Peter Lavalley  
Executive Director

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