



**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 • Website: www.pdcc.wa.gov

April 17, 2019

Delivered electronically to snocodems@gmail.com and halvorson.eric@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Case 25234

Dear Eric Halvorson:

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

As noted in the letter to Mr. Morgan, the PDC will not conduct a more formal investigation into these allegations or take further enforcement action in this matter. However, based on the mitigating factors listed in this matter, PDC staff is reminding the Snohomish County Democratic Party about the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities, especially the requirement to file weekly C-3 reports beginning June 1 when the committee is participating in an election in the future.

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 pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Alice Fiman
PDC Compliance Officer

s/ _____
BG Sandahl, Deputy Director
For Peter Lavallee, Executive Director



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April 17, 2019

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding, Snohomish County Democratic Central Committee, PDC Case 25234

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed Sept. 18, 2017, against the Snohomish County Democratic Central Committee (Committee), a bona fide county political party organization registered with the PDC as a committee since at least 1996. Specifically, you alleged that the Committee may have violated RCW 42.17A.235 and .240 by failing to timely file complete and accurate Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports).

PDC staff reviewed the allegations listed in your complaint, the statutes, rules, and reporting requirements for a political committee, the Committee Registrations (C-1pc report), Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Committee, and the response provided by Eric Halvorson, current Committee treasurer, and data in the PDC contribution and expenditure database filed by the Committee.

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

- On February 17, 2017, the Committee filed a C-1pc report as a continuing committee selecting the Full Reporting Option and listing Mario Brown as Campaign Manager and Garrett G Havens as Treasurer.
- On February 26, 2018, the Committee filed an amended C-1pc report as a continuing committee, selecting the Full Reporting Option and listing Hillary Moralez as Campaign Manager and Richard Moralez as Treasurer.
- On October 16, 2018, Stephanie Vignal, Committee Secretary notified the PDC that Richard Moralez had unexpectedly passed away that week, and his daughter, Hillary Moralez, is the Committee Chair.
- On Oct. 17, 2018, the Committee timely filed an amended C-1pc report changing its name to the Snohomish County Democratic Party (Party) and listing Hillary Moralez as Campaign Manager and Eric Halvorson as Treasurer.

- Staff’s review found that in 2017 the Committee received \$53,897 in total contributions and made \$47,024 in expenditure. The initial C-4 reports were timely filed by the Committee, including the 21-Day, 7-Day and Post Primary and General Election C-4 reports disclosing: (1) two expenditures totaling \$18,414 to Tulalip Resort Casino for a fundraising dinner for the committee; (2) \$3,500 to Turner World Enterprises, LLC for a speaker’s fee; (3) \$3,100 to the Everett Building Trades Association for rent for 2017; and (4) a \$3,075 expenditure for fair booth rental at the Evergreen State Fairgrounds.
- The review found the Committee made a total of \$4,000 in monetary contributions in 2017 that included a \$3,000 contribution to Brian Sullivan for Everett Mayor on June 18, 2017, and \$1,000 to the Snohomish County Young Democrats made on September 15, 2017. The review also found that the Committee filed C-3 reports on the C-4 reports dates for all of calendar year 2017, instead of filing weekly C-3 reports for contributions received and deposited beginning June 1, 2017.
- Mr. Halvorson stated in his response “As is unfortunately very normal in all-volunteer organizations like ours, the persons responsible for maintaining records and filing accurate reports with the PDC are no longer in office. The Snohomish County Democratic Central Committee has since elected a new chair and a new treasurer, and it is our commitment moving forward that all of our finances and the necessary reporting of same should be able to withstand the toughest scrutiny with flying colors.”
- On Dec. 4, 2018, PDC staff issued a formal written warning to the Committee for PDC Case 40870 concerning the allegations of failing to timely and accurately file C-3 and C-4 reports disclosing contributions and expenditures activities in accordance with RCW 42.17A.235 and .240. In the letter, PDC staff stated the expectation the Committee will timely file complete and accurate reports in future years in accordance with PDC laws and rules, including the timely depositing of contributions within five business days of receipt.

PDC staff found no evidence of a material violation that would require conducting a more formal investigation into your complaints or pursuing enforcement action in this instance. However, based on the mitigating factors listed above, PDC staff is reminding the Snohomish County Democratic Party about the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities, especially the requirement to file weekly C-3 reports beginning June 1 when the committee is participating in any election in the future.

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 toll-free at 1-877-601-2828, or by e-mail at alice.fiman@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
 Alice Fiman
 PDC Compliance Officer

s/ _____
 BG Sandahl, Deputy Director
 For Peter Lavalley, Executive Director