



**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)**

August 9, 2019

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

Subject: Complaint regarding Roger Goodman, PDC Case 25125

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 9, 2017. Your complaint alleged that Roger Goodman, a candidate for State Representative in the 45<sup>th</sup> Legislative District in 2016, may have violated RCW 42.17A.235 by failing to timely and accurately file C-3 and C-4 reports, including the failure to properly report the purpose of expenditures, as required WAC 390-16-037 and WAC 390-16-205, and RCW 42.17A.240 by failing to properly report debt.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the Friends of Roger Goodman (Campaign); and the response provided by the Campaign.

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

- On August 25, 2015, Rodger Goodman timely filed a C-1 report declaring his candidacy for State Representative for the 45<sup>th</sup> Legislative District in 2016 and selected the Full Reporting Option.

Allegation One: Failure to timely file C-3 and C-4 reports.

- PDC staff reviewed the 128 alleged late C-3 reports (Exhibit A) and 36 C-4 reports (Exhibit B) you included in your complaint. Staff found that for the 128 C-3 reports included with your complaint (Exhibit A), six reports were between one and 15 days late, three were between 34 and 58 days late, while 2 reports were between 162 and 185 days late, accounting for \$4,362.51 in late reported contributions. For the C-4 reports (Exhibit B), all 36 reports on the exhibit were amendments that were originally filed timely.

Allegation Two: Failure to timely and accurately report debt.

- PDC staff reviewed the 57 alleged unreported debts you attached in the spreadsheet (Exhibit C). Staff found that 11 items on the spreadsheet appear to be orders placed and paid for during the same reporting period or payments made for recurring monthly obligations like salary or retainer payments made by the campaign and were therefore not required to be reported. For example, the \$4,000 paid to *Tomcon and Associates* for wages/salary between June 1 and November 1, 2016, is a recurring monthly payment that was already reported

by the Committee in prior reporting periods. The same applies to expenditures for office rent/space. For the remaining items, staff noted that they appear to be orders and/or obligations or debts that should have been reported on earlier C-4 reporting cycles prior to the payments being made. However, you did not provide any evidence to show that any of the expenditure depicted in your spreadsheet, was preceded by a promise to pay in an earlier reporting period.

Allegation Three: Failure to properly report the purpose of the expenditures.

- Staff reviewed the description of the payments/expenditures made by the Campaign and found that most of the expenses lacked proper description(s) or additional information as required by law/rule. For example, all the 19 payments made to *Northwest Passage Consulting* between May and October 2016 did not include the subvendor information. A more detailed description that includes the subvendor information/identity should have been included in the report by the Campaign.

Staff noted that there were expenditures made by the Campaign either to a vendor or consultant for which a more detailed explanation or description should have been provided. However, this shortcoming is mitigated by the fact that Roger Goodman has no prior violations.

Based on these findings staff has determined that, in this instance, the Campaign's failure to properly and accurately describe the purpose of expenditures and report debt, does not amount to a violation warranting further investigation.

However, staff is reminding Roger Goodman about the importance of filing timely and accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by his Campaign, including for debt and the importance of properly reporting the purpose of expenditures, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov)

Sincerely,

Endorsed by,

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavallee, Executive Director

cc: Roger Goodman