



**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.pdca.wa.gov

July 5, 2019

Delivered electronically to "stevebergquist@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 25002

Dear Steve Bergquist:

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 about the importance of the timely disclosure of all contribution and expenditure activities. PDC staff expects in the future that you will file timely, complete, and accurate reports in accordance with PDC laws and rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s

Fox Blackhorn
Compliance Coordinator 2

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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July 5, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Steve Bergquist, PDC Case 25002

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 5, 2017. The complaint alleged that Steve Bergquist, a 2016 candidate for State Representative for Legislative District 11, may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Citizens for Steve Bergquist (Campaign); the applicable PDC reports filed by the Campaign; and queried the Campaign’s 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 complaint alleged that 22 line-item contributions were filed on late C-3 reports, listing the date of amendment as the date the report was received, and incorrectly assigning election-related deadlines to reports filed near elections which the Campaign was not participating in.
- Of the C-3 reports alleged to be late, only one C-3 report was filed late, disclosing \$2000 or 2.09% of contributions in the 2016 election campaign, 1 day beyond the statutory deadline of RCW 42.17A.235.
- An additional C-3 report was voluntarily filed to report \$16.14 or .002% of contributions in that election campaign, and one of the amended reports removed a \$1,000 contribution from WA Medical PAC that had already been reported on C-3 report number 10071713, on the deadline set by RCW 42.17A.235.
- The complaint also alleged that 26 line-item expenditures and in-kind contributions were filed on late C-4 reports, listing the date of amendment as the date the report was received, and incorrectly assigning election-related deadlines to reports filed near elections which the Campaign was not participating in.
- Of the C-4 reports alleged to be late, only two C-4 reports were filed late, disclosing \$251 or 0.67% of total expenditures in the 2016 election campaign, filed between 1-59 days beyond the statutory deadlines of RCW 42.17A.235.

- While each of the amended C-4 reports were for underlying reports that were timely filed, the complaint did identify two expenditures that were not disclosed on these initial reports as required by RCW 42.17A.235 and .240.
- The Campaign failed to accurately file their 21- and 7-day pre-Primary C-4 reports in accordance with RCW 42.17A.240.
- On July 25, 2016, the Campaign amended their 21-day pre-Primary C-4 report to disclose \$127 in-kind contribution from Steve Bergquist for “Kickoff Supplies,” constituting 0.34% of expenditures in that election cycle, 13 days beyond the statutory deadline; and amended their 7-day pre-Primary C-4 on September 17, 2016, to disclose a \$704 in-kind contribution from the Washington State Democratic Party for “Votebuilder Subscription,” constituting 1.88% of total expenditures in that election cycle, 53 days beyond the statutory deadline of RCW 42.17A.235.
- The late and inaccurately reported information was minor in proportion to the Campaign’s contribution and expenditure activity, was disclosed by the Campaign once they were made aware of the non-compliance, and all reports and amendments were filed in a good faith attempt to comply before the complaint was received.

Based on our findings staff has determined that, in this instance, failure to timely report contributions and expenditures does not amount to a violation warranting further investigation.

PDC staff is reminding Steve Bergquist about the importance of the timely disclosure of all contribution and expenditure activities, and the timely filings of all future PDC reports in accordance with the statutes 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Steve Bergquist