



State of Washington

PUBLIC DISCLOSURE COMMISSION

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April 26, 2019

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding the Pacific County Democratic Central Committee, PDC Case 24460

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against the Pacific County Democratic Central Committee (Committee), a Continuing Bona Fide Political Party Committee registered with the PDC. The complaint alleged that the Committee may have violated RCW 42.17A.235 by failing to timely file Monetary Contribution reports (C-3 report) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports).

Staff reviewed the allegation listed in the complaint you filed, the statutes, rules and reporting requirements, the C-1pc, C-3 and C-4 reports filed by the Committee, and the response to the complaint provided by the Committee's Officers.

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

- On March 2, 2016, the Committee filed a Committee Registration (C-1pc report) as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option, and listing Lisa Ayers as the Committee Treasurer, and Kevin Spackman as Chair. The Committee has been registered and reporting with the PDC since June 1997.
- On February 3, 2017, the Committee filed a Committee Registration (C-1pc report) as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option, and listing James Clancy as the Committee Manager and Treasurer.
- On June 3, 2016, the Committee filed C-3 and C-4 reports disclosing contribution and expenditure information covering the period beginning January 1, 2016 and ending May 31, 2016. The C-3 and C-4 reports disclosed the Committee received \$13,267 in monetary contributions and carried forward \$20,414 in funds remaining from 2015 election year and made \$9,677 in expenditures that were disclosed between 24 and 145 days late.

- On December 18, 2016, the Committee filed C-3 and C-4 reports disclosing contribution and expenditure information covering the period beginning July 1 and ending November 30, 2016.
- The C-3 and C-4 reports disclosed the Committee received \$5,533 in new monetary contributions received during the period and made \$15,177 in new expenditures that included more than \$10,000 in monetary contributions to candidates. The C-3 and C-4 reports were disclosed by the Committee between 47 and 99 days late, and more than 40 days after the November 8, 2016 general election.
- Mr. Clancy, the Committee’s most recent Treasurer acknowledged that the 2016 C-3 and C-4 reports were filed late. On January 10, 2018, the Committee filed a December 2017 C-4 report which was marked as a “Final report” disclosing \$22,177.60 in expenditures made that included a \$16,700 to the Washington State Democratic Central Committee, and a \$5,050 expenditure to the South Pacific County Community Foundation for scholarships.
- On April 11, 2019, the Committee: (1) submitted a signed Statement of Understanding acknowledging violations of RCW 42.17A.235 for failing to timely file C-3 and C-4 reports during calendar year 2016, and paid a \$300 civil penalty for violating RCW 42.17A.235; and (2) filed a C-1pc report as an “Other Committee” selecting the Mini Reporting Option and attaching a memorandum stating the Committee was registering for a short window of period for the sole purpose of soliciting small contributions to pay for the \$300 penalty assessed by the PDC.

As noted above, the Pacific County Democratic 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 C-3 and C-4 reports during the 2016 election year. The \$300 penalty assessed resolves the allegations concerning the failure to timely and accurately file C-3 and C-4 reports.

Based on this information, the PDC has dismissed the complaint 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

Sincerely,

Endorsed by:

s/ _____
Erick Agina, Compliance Officer

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

cc: Jim Clancy

