



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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July 21, 2017

Sent electronically to Glen Morgan "glenmorgan89@gmail.com"

Subject: Complaint filed against Pacific Merchant Shipping Assn PAC, PDC Case 20796

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2017. Your complaint alleged that the Pacific Merchant Shipping Association PAC (PMSA PAC) made a \$1,000 contribution to the 2016 Dave Upthegrove for Lands Commissioner Campaign in June of 2016, but that PMSA PAC failed to file an Out-of-State Committee report (C-5 report) as required in accordance with RCW 42.17A.250.

PDC staff reviewed your allegations in light of PDC laws and rules in order to determine whether a formal investigation or enforcement action is warranted. Staff reviewed: (1) your complaint; (2) the PDC database for contribution information for PMSA PAC, an in-state PAC registered with the PDC; (3) viewed the actual PDC campaign finance reports filed by PMSA PAC; and (4) the June 26, 2017, response letter from Michael Jacob, Vice President and General Counsel for the PMSA. Based on staff's review, we found the following:

- On February 10, 2012, the Pacific Merchant Shipping Assn PAC filed a Committee Registration (C-1pc report) registering with the PDC as an In-State Continuing Political Committee and selecting the Full Reporting option. PMSA PAC has filed Monetary Contributions reports (C-3 reports) and Summary Campaign Contribution and Expenditure Report (C-4 reports) with the PDC since February of 2012 to present.
- On June 10, 2016, the 2016 Friends of Dave Upthegrove Campaign (Campaign) timely filed a C-3 report disclosing that on June 6, 2016, the Campaign received a \$1,000 monetary contribution from PMSA PAC.
- On July 12, 2016, PMSA PAC timely filed the 21-Day Pre-Primary Election C-4 report disclosing that on June 2, 2016, a \$1,000 monetary contribution was made to the Friends of Dave Upthegrove Campaign for Lands Commissioner.

PDC staff concluded that a more formal investigation into your complaint or pursuing enforcement action in this instance is not warranted. Therefore, PDC is returning your complaint filed against Pacific Merchant Shipping Association PAC without taking any action.

Glen Morgan Complaint Return Letter  
PDC Case 20796 (PMSA PAC)  
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If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,



Kurt Young  
PDC Compliance Officer

Endorsed by:



BG Sandahl  
Assistant Director

cc: Michael Jacob, VP and General Counsel for PMSA



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972