



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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June 23, 2017

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

Subject: Complaint filed against Novartis Pharmaceuticals, PDC Case 20720

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2017. Your complaint alleged that Novartis Pharmaceuticals made a \$1,000 contribution to the 2016 Jay Inslee for Governor Campaign in December of 2013, but that Novartis Pharmaceuticals 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 Novartis Pharmaceuticals; (3) Lobbyist Registration (L-1 report) and Monthly Lobbyist Expense reports (L-2) filed by Novartis Pharmaceuticals contract lobbyist Roman Daniels-Brown; (4) the Annual Lobbyist Employer report (L-3 report) filed by Novartis Pharmaceuticals; and (5) communications with Phil Lloyd, Treasurer for the 2016 Jay Inslee for Governor Campaign.

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

- On January 14, 2013, Roman Daniels-Brown timely filed an L-1 report disclosing that he was contract lobbyist for Novartis Pharmaceuticals in Washington State, and that he was also their Permanent Lobbyist.
- On October 5, 2014, the 2016 Jay Inslee for Governor Campaign (Campaign) timely filed a Monetary Contributions report (C-3 report) with the PDC disclosing that on September 23, 2014, the Campaign received a \$1,000 monetary contribution from Novartis Pharmaceuticals PAC.
- On October 11, 2014, Mr. Brown timely filed the September 2014 L-2 report disclosing that on September 14, 2014, Novartis Pharmaceuticals made a \$1,000 contribution to the 2016 Jay Inslee for Governor Campaign, and indicated that the source of the funds used to make the contribution was listed as "Novartis."

- The L-1 and Monthly L-2 reports filed by Mr. Brown, and the L-3 reports filed by Novartis Pharmaceuticals did not indicate that Novartis Pharmaceuticals had a political action committee (PAC) or that PAC funds had been used to make the \$1,000 contribution.
- Mr. Lloyd stated that when the contribution was data entered by staff, the word PAC was inadvertently added to the end of the Novartis Pharmaceuticals contribution. He confirmed that the contribution was made by Novartis Pharmaceuticals with corporate funds, and indicated that the Campaign has filed an amended C-3 report removing the word PAC from the Novartis Pharmaceuticals contribution.

PDC staff concluded that a more formal investigation into your complaint or pursuing enforcement action in this instance is not warranted. Novartis Pharmaceuticals used corporate funds to make the contribution, so no C-5 report was required to have been filed for that contribution. Therefore, PDC is returning your complaint filed against Novartis Pharmaceuticals without taking any action.

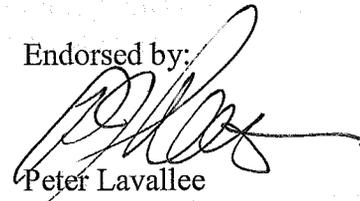
If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,



Kurt Young
PDC Compliance Officer

Endorsed by:



Peter Lavallee
Executive Director

cc: Roman Daniels-Brown with Novartis Pharmaceuticals



Public Disclosure Commission
Shining Light on Washington Politics Since 1972