



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

June 23, 2017

Sent electronically to Glen Morgan "[glenmorgan89@gmail.com](mailto:glenmorgan89@gmail.com)"

Subject: Complaint filed against MERCK, PDC Case 20712

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2017. Your complaint alleged that MERCK made a \$1,000 contribution to the 2016 Jay Inslee for Governor Campaign in December of 2013, but that MERCK 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 MERCK; (3) Lobbyist Registration (L-1 report) and Monthly Lobbyist Expense reports (L-2) filed by MERCK's lobbyist and employee, James Matteucci; (4) the Annual Lobbyist Employer report (L-3 report) filed by MERCK; 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 8, 2013, James Matteucci timely filed an L-1 report disclosing that he was Full time employee of MERCK, and that he would lobbying for MERCK in Washington State as their Permanent Lobbyist.
- On January 8, 2014, the 2016 Jay Inslee for Governor Campaign (Campaign) timely filed a Monetary Contributions report (C-3 report) with the PDC disclosing that on December 13, 2013, the Campaign received a \$1,000 monetary contribution from MERCK PAC.
- On January 12, 2014, Mr. Matteucci timely filed the December 2013 L-2 report disclosing that on December 13, 2013, MERCK 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 "MERCK SHARP AND DOHME CORP."
- The L-1 and Monthly L-2 reports filed by Mr. Matteucci, and the L-3 reports filed by MERCK did not indicate that MERCK had a political action committee (PAC) or that PAC funds had been used to make the \$1,000 contribution.

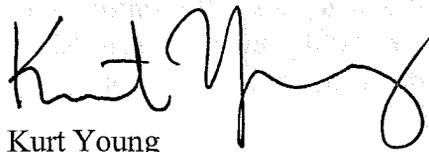
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- Mr. Lloyd stated that when the contribution was data entered by staff, the word PAC was inadvertently added to the end of the MERCK contribution. He confirmed that the contribution was made by MERCK with corporate funds, and indicated that the Campaign has filed an amended C-3 report removing the word PAC from the MERCK contribution and adding "CORP" at the end.

PDC staff concluded that a more formal investigation into your complaint or pursuing enforcement action in this instance is not warranted. MERCK 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 MERCK without taking any action.

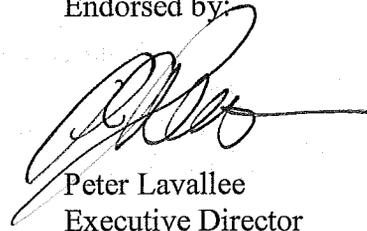
If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,



Kurt Young  
PDC Compliance Officer

Endorsed by:



Peter Lavalley  
Executive Director

cc: James Matteucci with MERCK



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