



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

September 7, 2017

Delivered electronically to "zitaport@gmail.com"

Subject: PDC Case 17545

Dear E.J. Zita:

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) on May 3, 2017. The complaint alleged that you may have violated RCW 42.17A.205, .235, .240, .425, .465, .700, & .710 for failure to accurately and timely disclose reports of contributions, expenditures, committee officers, and financial affairs. A copy of the complaint was previously sent to you.

As noted in the letter to Glen Morgan the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter. However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning your failure to accurately and completely list debts and obligations. For example, no expenditure for a post office box was reported. You state in your response that this was hosted by the Mailbox and its cost "was included in the anticipated cost of future mailings." This is improper, as the anticipated cost of future mailings was set, and rent waived in anticipation of a future expenditure. It should have been reported as a debt on Schedule B of the C-4 up until the point it was discharged by an expenditure. This letter also serves as a warning concerning your failure to accurately and completely break down expenditure details per WAC 390-16-037.

Staff expects you to fully and completely disclose debts and expenditure details in future years in accordance with PDC laws and rules. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 fox.blackhorn@pdc.wa.gov.

Sincerely,

Fox Blackhorn
Compliance Coordinator

Endorsed by,

Peter Lavallee
Executive Director

Enclosure: Letter to Glen Morgan



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September 7, 2017

Delivered electronically to “glenmorgan89@gmail.com”

Subject: Complaint regarding E.J. Zita, PDC Case 17545

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on May 3, 2017. The complaint alleged that E.J. Zita may have violated RCW 42.17A.205, .235, .240, .425, .465, .700, & .710 for failure to accurately and timely disclose reports of contributions, expenditures, committee officers, and financial affairs.

PDC staff reviewed your allegations, and as a result of staff’s initial review, we found the following:

- Candidate Zita failed to accurately and timely report debts, such as for the Mailbox in violation of RCW 42.17A.240, and failed to accurately and completely provide detailed breakdowns of expenditures in violation of WAC 390-16-037.
- The PDC does not require treasurers who indicate in box 5 of the C-1 that they do not perform only ministerial functions to be listed in duplicate in box 7 of the C-1.

Based on these initial findings, staff has determined that in this instance, failure to completely and accurately report debts and detailed breakdowns of expenditures does not amount to a material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), E.J. Zita will receive a formal written warning concerning failure to accurately and completely list debts and obligations. For example, no expenditure for a post office box was reported, which E.J. Zita’s response stated was hosted by the Mailbox and “was included in the anticipated cost of future mailings.” This is improper, as the anticipated cost of future mailings was set, and rent waived in anticipation of a future expenditure. It should have been reported as a debt on Schedule B of the C-4 up until the point it was discharged by an expenditure. This letter also serves as a warning concerning failure to accurately and completely break down expenditure details per WAC 390-16-037.

The formal written warning will include staff’s expectation that E.J. Zita fully and completely discloses debts and expenditure details in future years in accordance with PDC laws and rules.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

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 fox.blackhorn@pdc.wa.gov.

Sincerely,



Fox Blackhorn
Compliance Coordinator

Endorsed by,



Peter Lavalley
Executive Director

cc: E.J. Zita