



**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

February 25, 2019

Delivered electronically to "lauren@workjusticelaw.com"

Subject: Complaint filed by Glen Morgan, PDC Case 16055

Dear Lauren Berkowitz:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of completely and accurately disclosing the required information on the F-1 report. In the future, PDC staff expects that you will submit fully completed forms as required by PDC statutes and rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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February 25, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Lauren Berkowitz, PDC Case 16055

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 30, 2017. Your complaint alleged that Lauren Berkowitz may have violated RCW 42.17A.240 for failure to accurately report the date a contribution was received on a Monetary Contribution report (C-3 report); RCW 42.17A.205 for failure to register as a candidate after receiving a \$500 and renewing website; RCW 42.17A.235 for failure to timely and accurately file C-3 reports and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) after renewing candidacy, disclosing contributions and expenditures undertaken by the Campaign, and to retain books of account for five years after the close of the 2013 election campaign; RCW 42.17A.700 for failure to check a box on the Personal Statement of Financial Affairs (F-1 report) indicating understanding of RCW 42.17A.555; and RCW 42.17A.710 for failure to disclose the names of business customers making payments of \$12,000 or more on the supplement to the F-1 report, certifying financial activities for calendar year 2016.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the responses provided by Lauren Berkowitz; the applicable PDC reports filed by Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- Lauren Berkowitz ran for and secured election to the Burien City Council in the 2013 election cycle, which is beyond the PDC’s statute of limitations at RCW 42.17A.770. Any allegations related to the 2013 election cycle are beyond the PDC’s scope of review.
- Following the 2013 election cycle, Lauren Berkowitz has not sought re-election to any office, and has received no contributions and made no expenditures to support a future candidacy.
- On April 15, 2016, Lauren Berkowitz filed an F-1 report certifying financial activities for calendar year 2015, and admits to inadvertently leaving the box acknowledging understanding of RCW 42.17A.555 unchecked.
- On March 14, 2017, Lauren Berkowitz made a good-faith effort to disclose a business customer of Lauren H. Berkowitz, Attorney at Law, PLLC, listing them as “Confidential Individual Client.”

- While that description would not be sufficient for a business customer, this client was a natural person, and not an entity as provided by RCW 42.17A.710(1)(g)(ii), and was thus not required to be reported.
- On February 20, 2019, Lauren Berkowitz amended the F-1 supplement to remove the Confidential Individual Client.

Based on these findings staff has determined that, in this instance, failure to check the box on the F-1 report acknowledging understanding of RCW 42.17A.555, does not amount to an actual violation warranting further investigation.

PDC staff is reminding Lauren Berkowitz about the importance of completely and accurately disclosing the required information on the F-1 report. In the future, PDC staff expects that Lauren Berkowitz will submit fully completed forms as required by PDC statutes and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

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 fdc@fdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Lauren Berkowitz