



State of Washington

**PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

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July 9, 2018

Delivered electronically to Jay Manning at “[jmanning@cascialaw.com](mailto:jmanning@cascialaw.com)”

Subject: Jay Manning/Cascadia Law Group Complaint Return Cover Letter, PDC Case 15776

Mr. Manning:

Below is a copy of an electronic letter sent to Glen Morgan concerning the complaint he filed against the Cascadia Law Group and you alleging violations of the Public Disclosure Commission (PDC) concerning the lobbyist registration and reporting requirements.

As noted below in the electronic letter to Mr. Morgan, the two-year statute of limitations concerning the allegations listed in the Citizen Action Notice he filed with the Attorney General’s Office has expired. Based on staff’s review, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

PDC staff is reminding the Cascadia Law Group, Ms. Turner and you about the importance of the timely disclosure of all lobbying related activities addressed to the Washington State Legislature or any Washington State agency for any clients in the future.

If you have questions, please contact PDC staff member Kurt Young by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Kurt Young  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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July 9, 2018

Delivered electronically to Glen Morgan at “glenmorgan89@gmail.com”

Subject: Complaint filed against Jay Manning, PDC Case 15776

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 20, 2017. Your complaint alleged that Cascadia Law Group, as a lobbyist firm, and Jay Manning, as an agent or employee of Cascadia Law Group who lobbied in 2015, may have violated RCW 42.17A.605 and .615 by failing to: (1) timely file monthly Lobbyist Expense Reports (L-2 reports) disclosing lobbying activities; (2) disclose the percentage of time spent lobbying the Legislature or State Agencies on the L-2 report, and (3) file a lobbyist photograph along with the Lobbyist Biography page along with the Lobbyist Registration (L-1 report).

PDC staff reviewed the allegations listed in your complaint, the statutes and rules, the L-1 report and L-2 reports filed by Cascadia Law Group, and the March 31, 2017, response letter from Jessie Turner, Policy and Government Affairs Specialist for Cascadia Law Group. As a result, we found the following:

- On January 27, 2015, Cascadia Law Group (CLG) filed a Lobbyist Registration (L-1 report) registering as a Lobbying Firm disclosing Net-0 Consulting as the Lobbyist Employer. The L-1 report disclosed Jay Manning and Jesse Turner on line #10 of the form as employees or agents of CLG that would be engaging in lobbying activities on behalf of Net-0 Consulting.
- Ms. Turner stated the allegations listed in the complaint concerning the late filed L-2 reports was accurate, and that the L-2 reports she filed on behalf of CLG were filed one to two days late for three months in 2015, January, May and July. She stated that she was new to lobbying and the lobbyist disclosure requirements on the L-2 reports in 2015.
- PDC staff reviewed the L-2 reports filed by CLG and verified the L-2 reports filed for months of January, May and July of 2015 were filed one to two days late. Staff noted that the remaining L-2 reports for 2015 were timely filed. The L-2 reports disclosed CLG received \$4,000 in compensation from Net-0 Consulting for the months of January through September of 2015, and no compensation for October through December of 2015.
- Ms. Turner stated that the 5%- 30% range of the time CLG spent lobbying the legislature on behalf of Net 0 Consulting, was the total amount the firm spent lobbying in any given month.

- Ms. Turner stated that the remainder of Mr. Manning's and her time was spent on non-lobbying, non-reportable activities on behalf of Net-0 Consulting. The percentages she listed on the L-2 reports were estimates based on the amount of time CLG spent each month directly lobbying the legislature, including contacts made with members of the legislature. She stated that the L-2 reports left the state agency percentage blank because CLG did not spend any time engaging in reportable lobbying activities of any state agency on behalf of Net-0 Consulting. She confirmed that CLG had no reportable state agency lobbying activities to disclose on the L-2 reports.
- Finally, Ms. Turner stated that she found there were numerous registered lobbyists on the PDC lobbyist pictorial that did not file a photograph or biography along with the L-1 report. She stated that prior to filing the L-1 report for CLG, and officially registering, she had many conversations with PDC staff, she was not informed of a requirement to submit a lobbyist photograph or biography. In addition, she stated that she was never asked by PDC staff to submit those items, that a photograph or biography was even required or a violation.

For your information, the two-year statute of limitations concerning the allegations listed in the Citizen Action Notice you filed with the Attorney General's Office has expired. The three L-2 reports were filed one to two days late by Cascadia Law Group, and prior to PDC staff sending out warning letters for missing or late filed L-2 reports during calendar year 2015.

PDC staff is reminding the Cascadia Law Group, Mr. Manning and Ms. Turner about the importance of the timely disclosure of all lobbying related activities addressed to the Washington State Legislature or any Washington State agency for any client in the future.

Based on these findings, staff has determined that in this instance, there is no evidence to support a finding of a material violation by Cascadia Law Group and Jay Manning which would warrant further investigation. 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 Kurt Young by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by,

/s \_\_\_\_\_  
Kurt Young, Compliance Officer

/s \_\_\_\_\_  
Barbara Sandahl, Deputy Director  
For Peter Lavalley, Executive Director

cc: Jay Manning and Jesse Turner