



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Campaign Finance Unit
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Delivered via electronic mail

May 11, 2017

Glen Morgan
1001 Cooper Point Road SW #140-222
Olympia, WA 98502
Glenmorgan89@gmail.com

**RE: Citizen Action Notices: Thurston County Democratic Central Committee (2), (3)
Notice of Results**

Dear Mr. Morgan:

The Attorney General's Office has completed its initial review of your second and third citizen action notices against the Thurston County Democratic Central Committee, which you filed with our office on February 13 and March 16, 2017 respectively. You also first filed these allegations in complaints to the Public Disclosure Commission.

The Attorney General's Office reviewed the allegations in both notices, the Committee's response to the allegations, and PDC filings, and decided to proceed with enforcement action on the allegation that the Committee failed to properly report expenditures, debts, and obligations related to a brunch event it held on February 25, 2017 (Third Notice Allegation No. 2). Please note that the State is already proceeding on Allegation No. 2 in your Second Notice.

Your remaining allegations, even if true, provide an insufficient basis to use state resources to pursue an enforcement action in superior court. As such, the Attorney General's Office, in an exercise of its prosecutorial discretion, is declining to file an action on these claims.

That said, the Commission has jurisdiction over the allegations; any decision on how to respond to the allegations will be left with the Commission. Following review, the Commission may institute an enforcement proceeding related to your notice or may recommend such an action to our office. The allegations left to the Commission to review include:

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1. Failure to list addresses for two expenditure recipients. (Second Notice Allegation No. 1).
2. Failure to report debt for legal expenses (Third Notice Allegation No. 1): You did not provide nor could our office locate any direct evidence that the Committee incurred a debt or obligation exceeding \$250 in value during the month of February 2017.
3. Failure to list all political committee officers on form C-1pc (Third Notice Allegation No. 3): You did not provide nor could our office locate any direct evidence of the alleged unreported officers' activities.
4. Failure to include address of a vendor (Third Notice Allegation No. 4).

If you have any questions about these decisions, please advise.

Sincerely,



WALTER M. SMITH
Assistant Attorney General

WMS:lb

cc: Darwin Roberts, Deputy Attorney General
Taki Flevaris, Counsel for Respondent, Thurston County Democrats
Elizabeth Petrich, Thurston County Prosecutor's Office
B.G. Sandahl, Public Disclosure Commission