



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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

November 30, 2017

Sent electronically to Glen Morgan

Subject: Complaint filed against John Wilson, PDC Case 14854

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 6, 2017. Your complaint alleged that John Wilson, a candidate for King County Assessor in 2015, violated RCW 42.17A.205 by failing to disclose required information on the Candidate Registration (C-1 report), and RCW 42.17A.235 and .240 by failing to: (1) timely disclose contribution and expenditure activities, including debts and obligations on Summary Full Contributions and Expenditures report (C-4 report); (2) provide the required information or breakdown for those expenditure activities; and (3) provide the required contributor information on Monetary Contributions reports (C-3 report).

Your complaint was filed as a Citizen Action complaint, and the Attorney General's Office has notified PDC staff they will not be taking action on the allegations listing the complaint. PDC staff reviewed allegations in your complaint, and as a result we found the following:

Allegations concerning the C-1 report:

- On February 9, 2015, John Wilson filed a C-1 report declaring his candidacy for King County Assessor, selecting the Full Reporting option and listing Tom Perry as Treasurer. Mr. Perry submitted the letter responding to the allegations listed in the complaint, and stated neither Bailey Stober or himself were committee officers for the Campaign. He stated neither of them were authorized to make decisions or expenditures on behalf of the Campaign, and he added that he only performed ministerial services for the Campaign.
- Concerning the domain name, Mr. Perry stated that the Campaign did not believe that when Mr. Wilson purchased the domain name in October of 2014, that in and of itself did not trigger the filing of a C-1 report. He added that since the domain name was not an in-kind contribution, the Campaign was no reason to file a C- report or C-4 report.

Allegations concerning the C-3 and C-4 report:

- Mr. Perry stated that the photograph used by the Campaign was a professional photo that the candidate had done in the past, prior to becoming a candidate for public office. Since the candidate purchased the rights to use the photo using his personal funds, and was considered a personal photo, the Campaign didn't believe it needed to report it as an in-kind contribution.

- Mr. Perry stated the expenditure for the post office box rental was paid for by him, and that the Campaign reimbursed him on April 12, 2015. He stated the expenditures made to the political party organizations were for Mr. Wilson to attend Campaign events as a candidate, and were not used to for contributions. He stated the Campaign included descriptions for all expenditures, and that some of the descriptions are more detailed than others. He added some of the descriptions listed on the Schedule A to C-4 reports could have been more detailed, and that the Campaign will provide better descriptions in the future.
- Mr. Perry stated that the Campaign made its “best efforts” to find and disclose the occupation and employer information for individual contributors that contributed more than \$100. He stated that the Campaign ended up not obtaining that information for four contributors which represented 2.5% of the 2015 individuals who contributed over \$100.

Based on these findings, staff has determined that in this instance, no evidence supports a finding of a material violation warranting further investigation against the 2015 John Wilson Campaign. While the Campaign did not provide the occupation and employer information for four contributors, the Campaign did substantially comply with the Occupation and Employer reporting requirements for 97.5% of contributions received from individuals of more than \$100.

PDC staff is reminding John Wilson about the importance of the timely disclosure of all contribution and expenditure activities and PDC reports, including informing him that an expenditure to purchase a domain name which contains a public office would trigger the filing of a C-1 report within two weeks of the initial expenditure. 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 PDC staff member Kurt Young 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,

Endorsed by:

Kurt Young  
PDC Compliance Officer

Barbara Sandahl, Assistant Director for  
Peter Lavalley, Executive Director

cc: John Wilson