



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: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

March 18, 2019

Sent electronically to Larry Seaquist

Subject: Larry Seaquist Complaint Return Letter, PDC Case 9510 & 27044

Mr. Seaquist:

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) on November 4, 2016, against you. As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

You completed a Statement of Understanding (SOU) acknowledging violations of RCW 42.17A for failing to timely and accurately file campaign finance reports and paid a \$300 civil penalty, resolving the allegations for failing to timely and accurately file campaign finance reports. While not alleged in the complaint, PDC staff found discrepancies in the reporting of candidate loans from you and the Campaign expenditures made to you as candidate loan repayments that required amended C-3 and C-4 report to be filed. Your Campaign has filed amended C-4 reports more accurately disclosing the monetary and in-kind contribution loans from you to your Campaign and the subsequent loan repayments.

However, PDC staff is reminding you that in the future should you again become a candidate, the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities, including the reporting of debts and obligations, loans and loan repayments, and providing the sub-vendor breakdown as required by PDC laws and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed the two complaints for PDC Cases 9510 and 27004, in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
BG Sandahl, Deputy Director for
Peter Lavalley, Executive Director



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March 18, 2019

Sent electronically to Glen Morgan “glenmorgan89@gmail.com”

Subject: Larry Seaquist Complaint Return Letter, PDC Cases #9510 & #27044

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the two complaints you filed on November 4, 2016 and November 20, 2017 respectively, against Larry Seaquist, a candidate seeking election to the office of State Representative in 2016. The complaints alleged that Larry Seaquist may have violated RCW 42.17A.235 and .240 by failing to timely file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contribution and expenditure activities, including the reporting of debts and obligations, and providing the required sub-vendor breakdown for a \$40,000 Campaign expenditure for a media buy.

To more efficiently use PDC resources, the PDC has combined the two complaints into this one letter. PDC staff reviewed the allegations listed in the two complaints, the laws, rules and reporting requirements, the C-3 and C-4 reports filed by the Larry Seaquist Campaign (Campaign), and the responses from Mr. Seaquist and George Robinson, Treasurer for the Campaign. Based on staff’s review, we found the following:

- On January 5, 2016, Larry Seaquist filed a Candidate Registration (C-1 report) declaring his candidacy for Superintendent of Public Instruction (SPI) in 2016, selecting the Full Reporting Option and listing George Robinson as Treasurer. Mr. Seaquist is former four-term State Representative having served in the 26th Legislative District since being elected in 2016.
- On May 18, 2016, Larry Seaquist filed a C-1 report declaring his candidacy for State Representative from the 26th Legislative District in 2016, selecting the Full Reporting Option and listing George Robinson as Treasurer. When he declared his candidacy for State Representative, Mr. Seaquist discontinued his campaign for SPI.
- For the 2016 election cycle, the Campaign filed a total of 29 initial C-4 reports and amended C-4 reports, that included timely filing the June 2016 C-4 report, the 21-Day and 7-Day Pre-Primary Election C-4 reports, the Post-Primary C-4 report, and the 21-Day Pre-General Election C-4 and Post-General Election C-4 reports.
- On October 18, 2016, the Campaign timely filed the 21-Day Pre-General Election C-4 report disclosing \$99,383 in monetary contributions received, \$37,171 for in-kind contributions received, and \$67,588 in expenditures made.

- On November 4, 2016, the Campaign filed the 7-Day Pre-General Election C-4 report, disclosing \$10,620 in monetary contributions received, and \$24,270 in expenditures made. The 7-Day Pre General Election C-4 report was required to have been filed by the Campaign no later than November 1, 2016 and was filed three days late.
- On November 7, 2016, the Campaign filed an amended 7-Day Pre-General Election C-4 report six days late and one day prior to the general election disclosing \$14,000 in previously unreported expenditures and \$15,017 in previously un-reported in-kind contributions received. The C-4 report disclosed a \$12,852 expenditure for a cable television advertising buy, and a \$14,800 in-kind contribution received from the Washington State Democratic Central Committee for mailings.
- The Campaign was required to file weekly C-3 reports every Monday beginning June 1 through November 7, 2016, disclosing contributions received during the previous five calendar days and deposited into the Campaign bank account.
- On November 8, 2016, the Campaign filed three C-3 reports disclosing \$4,525 in monetary contributions that were received and deposited into the bank account on October 22, 25, and 27, 2016, respectively. The three C-3 reports were filed by the Campaign between eight and 15 days late, and on the date of the November 2016 general election. However, the late filed C-3 reports represented only 1.7 percent of total contributions received for the entire 2016 election cycle.
- Mr. Robinson stated as Treasurer, he was on vacation in Europe from October 20 through November 6, 2016, without access to the internet, and that in his absence, Jo Rodman served as Assistant Treasurer and was responsible for making Campaign expenditures and filing the necessary PDC reports. He stated upon his return from vacation, he “became aware, by checking the report filing menu, that several reports had not been filed and I immediately filed all reports that had not been filed.”
- Mr. Robinson stated Ms. Rodman advised him that while he was out of the county, she had a problem filing reports using the Online Reporting of Campaign Activities (ORCA) filing software provided by the PDC. He indicated that she had been in contact with PDC staff concerning ORCA filing advice and that she “believed she had filed” all of the PDC reports required. He stated that he reviewed the filings and found that Ms. Rodman “had followed only the first steps for an upload and failed to click on the last step, therefore the reports had not been filed.”
- Concerning the allegations that the Campaign failed to disclose debts and obligations, and properly breakdown the sub-vendors on C-4 reports, Mr. Robinson stated that “each item was entered into ORCA as it was paid, that to the best of my knowledge all bills were paid in a timely manner and as presented and the information as to what was purchased is as shown on invoices. In my capacity as Treasurer, I reacted to invoices, paid them and reported them. I was not part of media or other buys” other than paying the invoice.
- The Campaign confirmed making a \$40,000 expenditure to Progressive Strategies NW on October 6, 2016 and listing the description as “Media.” Mr. Robinson reviewed the invoice indicating the media buy was with Comcast Spotlight, and he spoke with the consultant, who informed him “that the campaign sets parameters, such as when to start and time period to run, and then Comcast selects the actual spot to run.”

- On August 17, 2018, the Campaign filed an amended 21-Day Pre-General Election C-4 report disclosing that the \$40,000 expenditure made to Progressive Strategies NW on October 6, 2016, listing the description as “Comcast Spotlight cable buy 10/4 to 11/7.”

Larry Seaquist completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely file the 7-Day Pre-General Election C-4 report, and three C-3 reports as listed above. The \$300 penalty assessed in this matter resolves the allegations listed in your complaint concerning the late filed reports.

Based on these findings, and the fact that Mr. Seaquist has no prior PDC violations, staff has determined in this instance, failure to timely and accurately file campaign finance reports disclosing contribution and expenditure activities such as debts, loans, and providing the sub-vendor breakdown as required by PDC laws and rules reports does not amount to an actual violation warranting further investigation.

However, PDC staff is reminding you that in the future should you again become a candidate, the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities, including the reporting of debts and obligations, loans and loan repayments, and providing the sub-vendor breakdown as required by PDC laws and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed the two complaints for PDC Cases 9510 and 27004, in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

s/ _____
Kurt Young, Compliance Officer

Endorsed by:

s/ _____
BG Sandahl, Deputy Director for
Peter Lavalley, Executive Director

cc: Larry Seaquist

