



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 26, 2019

Sent Electronically to Dmitri Iglitzin on behalf of UFCW 21 PAC

Subject: UFCW 21 PAC Complaint Return Letter for on allegation, PDC Case 42719

Mr. Iglitzin:

Below is a copy of a letter sent electronically to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) against your client, UFCW 21 PAC (Committee).

As noted below in the letter sent to Mr. Morgan, the PDC will not be conducting a more formal investigation or taking enforcement action concerning the allegation that the Committee failed to timely deposited monetary contributions into the committee bank account within five business days of receipt. PDC staff will continue investigating the allegation concerning the Committee's failure to timely file campaign finance reports for calendar year 2017.

Based on this information, the PDC has dismissed this allegation listed in the complaint 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,

Endorsed by:

s/_____
Kurt Young, Compliance Officer

s/_____
Peter Lavalley, Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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February 26, 2019

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

Subject: Complaint filed against UFCW 21 PAC; PDC Case 42719

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of one of the allegations listed in the complaint you filed on October 29, 2018 against the UFCW 21 PAC (Committee). The complaint alleged that the Committee violated: (1) RCW 42.17A.235 and .240 by failing to file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditures reports (C-4 reports); and (2) RCW 42.17A.220 by failing to timely deposit monetary contributions into the committee bank account within five business days of receipt, as required for a political committee registered with the PDC.

PDC staff is continuing to investigate the allegations concerning the Committee's failure to file C-3 and C-4 reports for calendar year 2017. This letter only addresses the allegation for failing to timely deposit monetary contributions received by the Committee.

PDC staff reviewed your complaint, the statutes, rules and reporting requirements, the C-3 and C-4 reports submitted by the Committee for contribution deposit information, , and the response from the Committee. Based on staff's review, we found the following:

- On March 11, 2016, the Committee filed an amended Committee Registration (C-1pc report) with the PDC as a continuing committee, selecting the Full Reporting Option and listing Todd Crosby as President, Sarah Cherin as Committee Manager, and Faye Guenther as Treasurer.
- On July 18, 2017, the Committee filed an amended C-1pc report with the PDC as a continuing committee under the Full Reporting Option, and listing Mr. Crosby as President and Ms. Guenther as Treasurer, but the only change was to list James To as Committee Manger.
- The vast majority of the contributions received and disclosed by the Committee are from UFCW Local 21, and the Committee failed to file any C-3 reports during calendar year 2017 for monetary contributions received and deposited in the committee bank account.

- On August 24, 2018, the Committee filed nine C-3 reports covering the period January 1, 2017 through December 31, 2017, disclosing \$253,210 in monetary contributions received and deposited into the committee's bank account.
- RCW 42.17A.220 requires political committees to deposit monetary contributions into the designated committee bank account or depository, within five business days of receipt.
- Based on the deposit dates listed on the C-3 reports and the Schedule A to C-4 reports, the Committee timely deposited monetary contributions received during calendar year 2017. Since the vast majority of the contributions were from UFCW Local 21, and the Committee is sponsored by and affiliated with the UFCW Local 21, those contributions were clearly timely deposited.

PDC staff's review found that the Committee timely deposited monetary contributions into the committee bank account within five business days of receipt. Staff found no evidence of a material violation that would require conducting a more formal investigation into your complaint or pursuing enforcement action in this instance.

Based on this information, the PDC has dismissed this allegation listed in the complaint in accordance with RCW 42.17A.755(1). As noted above, PDC staff is continuing to investigate the allegations of late filed C-3 and C-4 report by the UFCW 21 PAC.

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,

Endorsed by:

s/ _____
Kurt Young
PDC Compliance Officer

s/ _____
Peter Lavalley
Executive Director

cc: Dmitri Iglitzin, legal counsel for UFCW 21 PAC

