



**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 15, 2018

Delivered electronically to Jo Fox Burr, President of Kitsap County Democratic Women PAC at "foxburr@comcast.net"

Subject: PDC Case 34593

Dear Jo Fox Burr:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Glen Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning your failure to timely file C-3 and C-4 reports. PDC staff expects that you will file timely and complete C-3 and C-4 reports, specifically those occurring during the accelerated reporting schedule prior to and after any election in which Kitsap County Democratic Women PAC participates by making monetary or in-kind contributions to candidates. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

Peter Lavallee  
Executive Director

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November 15, 2018

Delivered electronically to Glen Morgan at “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaint regarding Kitsap County Democratic Women PAC, PDC Case 34593

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 11, 2018. Your complaint alleged that Kitsap County Democratic Women PAC (KCDW-PAC) may have violated RCW 42.17A.235, .265, .205, .220, .320, .255 for failure to timely and accurately disclose contributions, expenditures, books of account, committee registration, and sponsor ID.

PDC staff reviewed your allegations, and as a result of staff’s review, we found the following:

- No evidence was provided to substantiate any allegations outside of late filing of C-4 reports in violation of RCW 42.17A.235.
- The complaint alleged violations of RCW 42.17A.235 for late filing of fourteen C-3 and five C-4 reports for calendar year 2016, and late filing of seven C-3 and four C-4 reports for calendar year 2017.
- The majority of the alleged violations concerning late C-3 reports were for deposits totaling under \$200, and C-4 reports disclosing small expenditures not including contributions to candidates.
- The Kitsap County Democratic Women PAC filed nineteen C-3 reports between 1 and 124 days late disclosing \$1,355 in total deposits including proceeds from low-cost fundraising events and individual donations under \$25. KCDW PAC filed a small number of C-4 reports late including the 2017 21-day pre-general C-4, submitted three days late on October 20, 2017, disclosing \$2,212 in total expenditures including \$2,000 in contributions to three city and mayoral candidates.

- In the response to the complaint, Jo Fox Burr, president for KCDW-PAC, stated that the late filing of the C-3 and C-4 reports were caused by a lack of knowledge regarding PDC reporting requirements and miscommunication between the treasurer and deputy treasurer who was filing reports in the treasurer's absence.

Pursuant to WAC 390-37-060(1)(b), Kitsap County Democratic Women PAC will receive a formal written warning concerning failure to timely file C-3 and C-4 reports. The formal written warning will include staff's expectation that Kitsap County Democratic Women PAC will file timely and complete C-3 and C-4 reports, specifically those occurring during the accelerated reporting schedule prior to and after any election in which Kitsap County Democratic Women PAC participates by making monetary or in-kind contributions to candidates. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on these facts, staff has determined that in this instance, failure to timely file C-3 reports disclosing a small amount of total contributions and a small number of C-4 reports, most of which had little activity or were submitted before the relevant election, does not amount to an actual material violation warranting further investigation. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Jennifer Hansen

Compliance Officer

Endorsed by,

/s \_\_\_\_\_

For Peter Lavalley

Executive Director

cc: Kitsap County Democratic Women PAC