



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

November 9, 2018

Delivered electronically to “bellevuefirepac@hotmail.com”

Subject: PDC Case 34591

Dear Steven Linden:

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. The formal written warning will include staff's expectation that you file timely and complete C-3 and C-4 reports in future years in accordance with PDC laws and rules. 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Peter Lavalley  
Executive Director



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November 9, 2018

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

Subject: Complaint regarding Bellevue Firefighters PAC, PDC Case 34591

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on April 11, 2018. Your complaint alleged that Bellevue Firefighters 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 initial review, we found the following:

- No evidence was provided to substantiate any allegations outside of late filing of C-3 and C-4 reports in violation of RCW 42.17A.235.
- The majority of the alleged violations were for voluntarily filed C-3 reports for bank interest, or C-3 and C-4 reports that were timely filed and later amended.
- Bellevue Firefighters PAC admits to late filing 20 C-3 and C-4 reports, including the C-4 covering May 2017, disclosing \$1,449.77 in contributions with \$0 in expenditures, 21 days beyond the statutory deadline.

Based on these initial findings, staff has determined that in this instance, failure to timely file a small number of C-3 and C-4 reports, does not amount to an actual material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Bellevue Firefighters 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 Bellevue Firefighters PAC files timely and complete C-3 and C-4 reports in future years in accordance with PDC laws and rules. 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 this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
For Peter Lavalley  
Executive Director

cc: Bellevue Firefighters PAC