



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

Nov. 9, 2018

Delivered electronically to “mcobb@mcobbandassociates.com”

Subject: PDC Case 34458

Dear: Michael Cobb

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) on April 11, 2018 against the Michael Cobb for Port Commissioner Committee.

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely filing Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports) in accordance with PDC laws, rules and reporting requirements, including using the electronic filing method for all future campaigns.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



**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.pdca.wa.gov

Nov. 9, 2018

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Michael Cobb, PDC Case 34458

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against Michael Cobb, a 2017 candidate for Port Commissioner for the Port of Port Angeles, District 1. The complaint alleged Mr. Cobb violated RCW 42.17A.235 and .240 by failing to timely file complete and accurate Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports).

PDC staff reviewed the allegations listed in the complaint, PDC laws, rules and reporting requirements, the Candidate Registration (C-1 report), C-3 and C-4 reports filed by Michael Cobb for Port Commissioner Committee (Campaign) and the response from Mr. Cobb.

Based on staff's review, we found the following:

- On June 19, 2017, Michael Cobb, filed a C-1 report declaring his candidacy for Port of Port Angeles Commissioner District 1, selecting the Full Reporting option, and listing himself as Treasurer. Mr. Cobb was a first-time candidate for public office in 2017, and he was defeated in the November 7, 2017 general election.
- Between June 19, 2017 and March 4, 2018, Michael Cobb filed a total of 37 C-3 and C-4 reports with the PDC, which included 10 amended reports.
- During the 2017 campaign, Michael Cobb filed C-3 and C-4 reports in two ways, by completing and mailing/emailing handwritten paper filed reports to the PDC, and by the electronic method using the PDC's Online Reporting of Campaign Activities (ORCA) campaign filing software.

- Since only two candidates filed for Port of Port Angeles Commissioner District No. 1, there was no 2017 primary held and Mr. Cobb was only required to file monthly C-4 reports due on the 10th of the month beginning June 19 through August 31, 2017, and a 21-Day Pre-General Election C-4 report due on October 17, 2017, and a 7-Day Pre-General Election C-4 report due on October 31, 2017.
- The Campaign timely filed the 21-Day Pre-General Election C-4 report on October 17, 2017, and the 7-Day Pre-General Election C-4 report was filed on November 3, 2017, three days late.
- The Campaign initially filed C-3 and C-4 reports on paper and then amended those reports later electronically using ORCA for reports covering June and July 2017. The original paper filed C-3 and C-4 reports were timely filed.
- The Campaign filed amended C-3 and C-4 reports electronically in October of 2017 prior to the general election being held, so the public was not deprived of critical information before and after the ballots had been mailed out.
- On April 24, 2018, the Campaign filed a final C-4 report disclosing \$12,783.67 in total contributions received and \$12,765.53 in expenditures made during the 2017 campaign. The final C-4 report was filed 134 days late.
- In his response, Michael Cobb stated “the C-3 and C-4 reports were filed as a combination of paper and electronic filings in the ORCA system. Most were completed and submitted on a timely basis. The only significant timing issue was with the final C-4 report, which was prepared in my computer but failed to upload in the ORCA system at the PDC until today, April 24, 2018. After review with Chip Beatty, your PDC expert with the ORCA system, the final report was uploaded as prepared prior to the Dec 11 deadline.”

Based on these findings, and the facts that Michael Cobb was a first-time candidate for public office in 2017, and the public was not deprived of critical information before and after the ballots had been mailed out, and he was defeated in the November 7, 2017 general election, staff has determined that in this instance, failure to timely file reports of contributions and expenditures does not amount to a material violation warranting further investigation.

The PDC is reminding Michael Cobb about the importance of timely filing C-3 and C-4 in accordance with PDC laws, rules and reporting requirements, including using the electronic filing method for all future campaigns. 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.

In addition, the PDC has also dismissed the allegations listed in your complaints that were based “on information and belief” in accordance with RCW 42.17A.755(1), since you failed to provide any evidence to support or substantiate those allegations.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at alice.fiman@pdc.wa.gov.

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director