



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

November 14, 2018

Sent electronically to Cindy Black at cindy@fixdemocracyfirst.org

Subject: WA Coalition to Amend the Constitution, PDC Case 33376

Ms. Black:

Enclosed is a copy of a letter sent to Glen Morgan regarding a complaint he filed with the Public Disclosure Commission (PDC) on March 28, 2018. The complaint alleged that the Washington Coalition to Amend the Constitution may have violated RCW 42.17A.235 for failing to timely and accurately file contribution (C-3) and expenditures (C-4) reports.

Pursuant to WAC 390-37-060(1)(b), this letter is a formal written warning to the Washington Coalition to Amend the Constitution Committee concerning the importance of filing timely and accurate reports disclosing campaign contribution (C-3 reports) and expenditure (C-4 reports) activities, for any future committee activities. The PDC will not be conducting a more formal investigation into the allegations listed in the complaint, but the PDC will consider this formal written warning if there are future PDC law or rule violations committed by the Washington Coalition to Amend the Constitution.

Accordingly, the PDC has dismissed this complaint in accordance with RCW 42.17A.755(1)(a).

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdcc.wa.gov.

Sincerely,

Endorsed by:

Erick Agina
PDC Compliance Officer

Peter Lavalley
PDC Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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November 14, 2018

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: WA Coalition to Amend the Constitution, PDC Case 33376

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on December 21, 2017. The complaint alleged that the Washington Coalition to Amend the Constitution may have violated RCW 42.17A.235 and .240 for failing to file timely and accurate reports disclosing campaign contribution (C-3 reports) and expenditure (C-4 reports) activities.

PDC staff reviewed the allegations listed in the complaint to determine whether a formal investigation or enforcement action is warranted. Staff reviewed all the exhibits submitted with the complaint, the C-3 and C-4 reports filed by the Washington Coalition to Amend the Constitution (Committee), and the July 23, 2018 response letter received from the Committee. Based on staff's review, we found the following:

- On August 13, 2014, the Committee filed a Committee Registration (C-1pc report) for the 2016 Election, selecting the Full Reporting Option, and listing Diane Jones and David Jette as the campaign manager and treasurer respectively. The Committee has been registered and reporting with the PDC since June of 2013.
- The Committee filed an amended C-1pc report on July 2, 2015, disclosing it was a ballot measure committee in support of Initiative 735, a nonbinding resolution to overturn the US Supreme Court Citizens United decision. The measure was approved by 64% of Washington voters on the November 8, 2016 general election.
- On June 22, 2017, the Committee filed a "Final" C-4 report disclosing \$585,942 in total contributions received and \$583,633 in total expenditures made. The complaint alleged that the Committee failed to timely file 22 C-3 reports and 19 C-4 reports in 2016 and 2017. The allegations of late filed campaign finance reports included 16 amended C-3 and C-4 reports.
- Staff's review found the Committee filed a total of 31 amended C-4 reports and 19 amended C-3 reports since July of 2015. The review also found the alleged non-amended late filed C-3 reports were filed between two and 137 days late, while the C-4 reports were filed between two to 112 days late.

- The late filed C-3 reports included: (1) a \$7.35 contribution was received on February 26, 2016 and filed on a C-3 report on July 25, 2016, 137 days late; and (2) three contributions totaling \$110 were received on April 21, 2016 and filed on a C-3 report was filed on May 21, 2016, 11 days late.
- The late filed C-4 reports included: (1) the January 2017 C-4 report that disclosed no contributions and \$209 in expenditures made and was filed 112 days late; and (2) the February 2017 C-4 report that disclosed no contributions and \$412 in expenditures made and was filed 84 days late.
- In their response to the complaint, the committee's former campaign manager stated that the committee has dissolved. She also stated that the former treasurer was a volunteer who did her best to make sure all reports were filed properly.

Based on these findings, the Washington Coalition to Amend the Constitution Committee will receive a formal written warning concerning its failure to timely report its contribution and expenditure reports pursuant to WAC 390-37-060(1)(b). The formal written warning conveys our expectation that the Washington Coalition to Amend the Constitution will fully comply with the requirement to timely file contribution and expenditure reports. The Commission will consider the formal written warning if there are any PDC law or rule violations by Washington Coalition to Amend the Constitution should they decide to register again as a political committee in the future.

Based on the above, the PDC has dismissed your complaint in accordance with RCW 42.17A.755(1)(a).

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov.

Sincerely,

Erick Agina
PDC Compliance Officer

Endorsed by:

Peter Lavellee
PDC Executive Director

cc: Washington Coalition to Amend the Constitution

