



**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)**

Feb. 7, 2019

Sent electronically to Andy Lo “[treasurer@andy-lo.com](mailto:treasurer@andy-lo.com)”

Subject: Complaint filed by Glen Morgan, PDC Case 27230

Dear Glen Pickus and Andy Lo,

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

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

If you have questions, you may contact me at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director



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Feb. 7, 2019

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

Subject: Complaint regarding, PDC Case 27230

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 25, 2017.

Your complaint alleged that Mukilteo for All may have violated RCW 42.17A.205, .235, .255, .320, and .335 by: (1) failing to list all committee members on Political Committee Registration reports (C-1pc); (2) failing to identify the source of contributions from various donors; (3) failing to timely file Campaign Summary Receipts and Expenditures reports (C-4) and Monetary Contributions reports (C-3); (4) failing to timely file Electioneering Communications (C-6) independent expenditures reports. (5) failing to list the top five contributors on political advertising; and (6) sponsoring of an advertisement constituting libel or defamation.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response from Andy Lo, treasurer; the applicable PDC reports and data in the PDC contribution and expenditure database filed by Mukilteo for All, to determine whether the record supports a finding of one or more violations.

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

- Mukilteo For All filed a C-1pc on October 10, 2017, opposing a single candidate, Peter Zieve, in the November 7, 2017 election. The C-1pc was amended November 3, 2017, updating the email address.
- Mukilteo For All filed as a single election committee, filing its final C-3 and C-4 reports on December 12, 2017.

**Allegation #1: Failing to identify the source of contributions from various donors and**

**Allegation #2: Failing to timely file C-3 and C-4 reports.**

The complaint alleged Mukilteo for All did not properly report the source of its contributions and expenditures, alleging that in-kind contributions, including a post office box, were not reported.

- Mukilteo For All treasurer Andy Lo stated the group is “a grassroots group of ordinary Mukilteo citizens who believe that Mukilteo should be for everyone. We do not have any secret donors.”
- On its final C-4, filed timely December 11, 2017, Mukilteo for All listed \$13,650 in in-kind contributions, with these contributions listed as debts on previous C-4 reports filed October 17, 2017.
- Andy Lo responded that the cost of the post office box was included in the fees paid for his professional services. A C-4 filed October 31, 2017, listed a \$300 debt owed to Andy Lo for treasurer services, with this debt paid on November 6, 2017. The expenditure was listed on a C-4 report filed December 11, 2017.

### **Allegation #3: Failing to list the top five contributors on its political advertising**

The complaint alleged Mukilteo for All did not list its top five contributors on a YouTube advertisement or postcard sent to Mukilteo voters.

- Andy Lo responded “No donors had given more than \$700 in the 12-month period before the communications were released, but our website has been updated continuously to include an accurate list of the top five contributors according to the law.”
- Mukilteo For All reported 63 donations through November 6, 2017. These ranged between \$.04 and \$500.

### **Allegation #4: Failing to list all committee members on its Political Committee Registration reports (C-1pc)**

- On the Mukilteo For All amended C-1pc, Glen Pickus was listed as Campaign Manager and Andy Lo was listed as treasurer. There were no other committee officers listed.
- Andy Lo responded “Members of the steering committee guide and advise, but all final decisions, strategic or otherwise, are made by those listed on our registration forms.”

### **Allegation #5 Sponsoring an advertisement constituting libel or defamation**

The complaint alleged Mukilteo For All sponsored a false or defaming postcard about Peter Zieve constituting libel or defamation.

- Andy Lo responded “all our statements are easily substantiated,” and cited media stories from The Seattle Times and Everett Herald.
- Mukilteo For All did not make any statements beyond what was stated in media reports and an investigation by the Washington State Attorney General.

### **Allegation #6: Failing to timely file C-6 independent expenditure reports within five days.**

The complaint alleged that Mukilteo for All failed to disclose an independent expenditure for a YouTube advertisement made available to the public on October 13, 2017.

- Andy Lo responded, “A C-6 report was not required for this expenditure, because it was reported in our C-4 reports.”
- Mukilteo For All filed an amended C-4 report on October 14, 2017 that listed an October 10, 2017 expenditure of \$1,600 to Arthur Allen for video production.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

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 [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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