



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

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**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. 6, 2019

Delivered electronically to Jennifer Gregerson “[jenngregerson@gmail.com](mailto:jenngregerson@gmail.com)”

Subject: PDC Case 27204

Dear Jennifer Gregerson:

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 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.

PDC staff is reminding you about the importance of timely filing reports. PDC staff expects that you will file timely in future years in accordance with PDC laws and rules.

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. 6, 2019

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

Subject: Complaint regarding Jennifer Gregerson, PDC Case 27204

Dear: Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 17, 2017. Your complaint alleged that Jennifer Gregerson may have violated RCW 42.17A.235 and .240 by: (1) failing to timely file Campaign Summary Receipts and Expenditures reports (C-4), and several Monetary Contributions reports (C-3); (2) failing to provide the proper reporting breakdown for a number of expenditures made by the campaign; (3) failing to report debts and obligations; and violations of RCW 42.17A.700 and .710 by failing to accurately file and amend the Personal Financial Affairs Statement (F-1).

You stated in allegation (5), that your allegations were based “On information and belief” but you failed to provide any evidence to substantiate those allegations. Therefore, staff did not review this allegation.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the November 4, 2017 response Jennifer Gregerson sent to the Washington State Attorney General (ATG); and the applicable PDC reports and data in the PDC contribution and expenditure database filed by Jennifer Gregerson, to determine whether the record supports a finding of one or more violations.

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

- Jennifer Gregerson was first elected to the Mukilteo City Council in 2004.
- Gregerson was elected Mayor of Mukilteo in November 2013 and re-elected in 2017.

**Allegation #1: Failing to timely file C-3 and C-4 reports**

The complaint alleged Jennifer Gregerson failed to timely file C-3 and C-4 reports in 2017.

- Gregerson stated, “I relied on the ORCA software unduly. I filed for my re-election on August 30, 2015, but had virtually no campaign activity, other than one donation in August 2015 and a few in January 2016. When there was activity, it was all filed in a timely manner. Any time I had expenses or expenditures, Orca prompted me, and I filed the reports on time. However, because I had not entered the date of my election in the Committee Information tab, Orca did not populate with the C4 due dates for the times when there was no activity. It was my mistake to not check that information outside of the software. When I began in earnest to campaign, this year, in May 2017, I did enter that information and the past due C4 reports became available. I filed them immediately. It is also true that a few reports in the last several months were filed between 1 to 6 days late. I have learned from this mistake and thank Mr. Morgan for reminding me of the focus on the criticality of meeting those deadlines.”
- Beginning on May 1, 2017, Gregerson filed numerous C-3 and C-4 reports for the time beginning August 30, 2015.

### **Allegation #2: Failing to report in-kind contributions and debt.**

The complaint alleged Gregerson did not report debts, including the cost of her campaign website domain registry and printing costs.

- Gregerson stated “I also regret the error of not reporting the recycling/in-kind contribution of my yard signs. I have remedied this today by re-filing the 5/10/17 C4. B) I also regret the error of not reporting the domain registration fee. I have remedied this by re-filing the 2/10/17 C4, showing the \$15.99 registration fee as an in-kind expense.”
- A \$200 in-kind contribution for 100 campaign signs was included in report 100798712, filed on Nov. 4, 2017.
- A \$15.99 in-kind contribution for website domain renewal was included in report 100798716, filed on Nov. 4, 2017.

### **Allegation #3: Failing to disclose debts and obligations on C-4 reports**

The complaint alleged that the Gregerson campaign failed to disclose debts and obligations on the C-4 report, for orders placed in a prior reporting period.

- An expenditure to Bruck Printing for \$794.60 was listed on a C-4 report filed May 1, 2017 covering the period March 1 – 31, 2017. This expense should have been listed as a debt when the order was placed.
- Gregerson stated, “I received this quote on 2/17/17 and I have remedied this by re-filing the 3/10/17 C4 and reflecting the debt/vendor invoice.” Report 100798715 lists a \$794.60 obligation to Bruck Printing and Silkscreen for an order placed Feb. 17, 2017.
- Regarding the allegation about the expenditure to Keith Brofsky for \$772.05 on June 6, 2017, Gregerson stated “the invoice was received on June 6 and paid that day. No quote was received in advance of that date.”

#### **Allegation #4: Failing to breakdown sub-vendor information for expenditures disclosed on C-4 reports**

The complaint alleged that the Gregerson campaign failed to properly break-down and describe expenditures, specifically the quantity of doorbelling cards printed on March 1, 2017 and the number of signs printed during the race.

- In a C-4 report filed May 1, 2017, Gregerson listed a \$794.60 expense for “slim jims/doorbell pieces.” Gregerson stated, “I did not realize that the number of doorbell pieces needed to be reported. I have remedied this by re-filing the 4/10/17 C4.”
- On November 11, 2017, an amended C-4 report listed the same expense, adding 2,500 pieces.
- As noted above, Gregerson updated her May 2017 C-4 report to list 100 campaign signs, and stated, “I have never reported the number of yard signs purchased/donated, but I have since learned that I need to do that.”

#### **Allegation #6: Failing to include sponsor identification on social media site**

The complaint alleged there was no sponsor identification on Gregerson’s Facebook page and advertisements.

- Gregerson stated she reviewed other candidate Facebook pages and added information to the “About” section of her Facebook page.

#### **Allegations #7, #8, and #9: Failing to disclose required information on the Personal Financial Affairs Statement (F-1 report)**

The complaint alleged Gregerson failed to disclose ownership of a Public Employees Retirement Systems (PERS) account, disclose offices held, and acknowledge an understanding of RCW 42.17A.555 on her F-1 reports.

- In her response, Gregerson stated, “When I was elected Mayor, I did receive the benefit of a PERS 2 account. I regret the error of not reporting this on my F1. I have remedied this by re-filing my 2015, 2016 and 2017 F1’s. The value in 2014 was below the threshold.”
- Regarding her offices held, Gregerson was informed by the PDC she does not need to list organizations she was appointed to as part of her work for the city, on her F-1 report. Gregerson has amended her 2016 and 2017 F-1 reports to include a board membership on the Domestic Violence Services of Snohomish County
- Gregerson filed an amended 2015 F-1, where she acknowledged understanding RCW 42.17A.555.

Gregerson made minor or ministerial errors on the F-1 report and several of the C-3 and C-4 reports filed for the 2017 election, including the sub-vendor breakdown and details of certain

expenditures. Upon notification of these errors, Gregerson timely amended her F-1, C-3 and C-4 reports making the necessary technical corrections.

Based on these findings staff has determined that, in this instance, the failure to timely file C-3 and C-4 reports, disclose orders placed, and provide the proper breakdown for expenditures does not amount to an actual violation warranting further investigation.

However, PDC staff is reminding Jennifer Gregerson of the importance of timely and accurate disclosure of campaign contribution and expenditure information, including timely filing C-3 and C-4 reports, disclosing orders placed, and including a proper breakdown of expenditures.

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 me at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director