



**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 • Website: www.pdcc.wa.gov

March 4, 2019

Delivered electronically to sheila@teetering.org and lewiscodemocratswa@gmail.com

Subject: Complaint Filed by Glen Morgan, PDC Case 26735

Dear Sheila Johnson-Teeter:

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 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.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a formal written warning concerning the Lewis County Democratic Central Committee's (LCDCC) failure to comply with the requirement to report contributions and expenditures under the full reporting option under RCW 42.17A.235 and 42.17A.240 from 2010-2017, even though the LCDCC likely qualified to report under the Mini Reporting Option during those years. Staff expects the LCDCC to file timely and complete reports in future years in accordance with PDC laws and rules.

The Commission will consider this 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 Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Alice Fiman
Compliance Officer

Endorsed by,
/s _____
Peter Lavallee
Executive Director



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March 4, 2019

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Lewis County Democratic Central Committee, PDC Case 26735

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 27, 2017. Your complaint alleged the Lewis County Democratic Central Committee (LCDCC) may have violated: (1) RCW 42.17A.205 by failing to timely file an amended Committee Registration (C-1pc report) updating committee information; and (2) RCW 42.17A.235 and 42.17A.240 by failing to timely file complete and accurate Monetary Contributions reports (C-3 reports) and Summary Full Campaign Receipts & Expenditures reports (C-4 reports).

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response from Sheila Johnson-Teeter, LCDCC treasurer; the applicable campaign finance reports filed by the LCDCC; and the PDC's Open Data for contributions made by or received from the LCDCC.

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

- The LCDCC is a bona fide county political party organization that has been registered and reporting with the PDC dating back to at least 1996.
- In February 2018, the LCDCC treasurer died suddenly and unexpectedly.
- Current party officers are not able to determine why no reports were filed from 2010-2017.

- A C-4 report filed by the LCDCC was submitted electronically on September 7, 2010, disclosing no contribution or expenditure activities for the reporting period, and showing cumulative annual contributions totaling \$4,364 and cumulative expenditures totaling \$4,011.
- Based on available records, current LCDCC leadership believes the committee stayed within the contribution and expenditure limits of the mini reporting system during the period of non-reporting and could have properly requested the Mini Reporting Option and been relieved of filing C-3 and C-4 reports (although it did not in fact do so).
- Current treasurer Sheila Johnson-Teeter attended training at the PDC on July 18, 2018.

Allegation One: Violation of RCW 42.17A.235 and 42.17A.240 for failing to timely and accurately file C-3 and C-4 reports.

- The complaint alleged that the LCDCC failed to timely and accurately file C-3 and C-4 reports from 2010-2017.
- PDC staff's investigation and review determined the LCDCC filed C-3 and C-4 reports through September 2010. The next C-3 was filed June 19, 2018.

Allegation Two: Violation of RCW 42.17A.205 for failing to file an amended statement of organization (C-1pc) with updated information, including making an annual selection of a reporting option.

- The LCDCC filed for both its exempt and non-exempt accounts in July 2009, choosing the full reporting option.
- In November 2017, the LCDCC (non-exempt account) filed a C-1pc, choosing the Mini Reporting Option. The C-1pc was then amended in June 2018 and again in August 2018 with updated treasurer information.
- The LCDCC filed its annual C-1pc January 15, 2019, choosing mini reporting.

Based on these findings, including that the Committee likely qualified for the Mini Reporting Option from 2010 to 2017, staff has determined that in this instance, the failure to file an annual C-1pc between January 1 and January 31 of each year, selecting the Mini Reporting Option, does not amount to an actual violation warranting further investigation.

However, pursuant to WAC 390-37-060(1), the Lewis County Democratic Central Committee will receive a formal written warning concerning its failure to comply with the requirement to report contributions and expenditures under the full reporting option under RCW 42.17A.235 and 42.17A.240 from 2010-2017, even though it likely qualified to report under the Mini Reporting Option. The formal written warning will include staff's expectation that the Lewis County Democrat Central Committee file timely and complete 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 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 (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Peter Lavalley
Executive Director