



**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

January 7, 2019

Delivered electronically to “deseanquinn@gmail.com”

Subject: Complaints filed by Glen Morgan, PDC Case Nos. 24240, 25497, 25972, & 27229

Dear De’Sean Quinn:

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.

PDC staff is reminding you about the importance of accurate and complete disclosure of sponsor identification on all political advertising, as well as the timely disclosure of all contribution and expenditure activities, including the in-kind contributions, and the timely filings of all future PDC reports in accordance with the statutes and rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

January 7, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaints regarding De’Sean Quinn (5-8), PDC Case Nos. 24240, 25497, 25972, & 27229

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed between August 17, 2017 and November 3, 2017. Your complaints alleged De’Sean Quinn may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign; RCW 42.17A.240 for failure to accurately and completely disclose debts and obligations, to breakdown expenditure details in accordance with WAC 390-16-037, and sub-vendor breakdowns in accordance with WAC 390-16-205; and RCW 42.17A.320 for failure to disclose sponsor identification on the Candidate’s Facebook page and a slideshow of photos.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the responses provided by De’Sean Quinn; the applicable PDC reports filed by Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- Many of the alleged violations of RCW 42.17A.235 were for amendments to timely filed C-3 and C-4 reports, which were not a violation under the version of RCW 42.17A.235 in effect at the time. In addition, reports that were addressed in the previous four complaints in this series were realleged, and will not be reexamined.
- Though each of the complaints alleged violations of RCW 42.17A.235 for failure to timely file C-3 and C-4 reports on the accelerated pre-Primary schedule, De’Sean Quinn did not appear on the Primary ballot and was not required to file accelerated reports until September 1, 2017.
- Within this series of four complaints were two additional C-3 reports that were filed beyond the deadlines set by RCW 42.17A.235: report 100788975 disclosing \$600 in contributions 14 days late, and report 100790543 disclosing \$1,000 in contributions 24 days late. Both reports were filed before the General Election.

- De’Sean Quinn initially failed to report in-kind contributions for legal services related to PDC complaints paid out-of-pocket from a good faith misunderstanding about the requirement, and promptly amended the reports upon notification of non-compliance.
- De’Sean Quinn’s Facebook displayed sponsor identification on the *About* page, which is insufficient to meet the one-click exemption for sponsor identification, and a Candidate’s Facebook page does not qualify for the media exemption for sponsor identification.
- De’Sean Quinn’s Facebook should have displayed sponsor ID somewhere on the main page, so that any voter may click past a post to see who sponsored the advertising.
- Political advertising is defined by RCW 42.17A.005(39) as mass communications used for the purpose of “*appealing, directly or indirectly, for votes or for financial or other support or opposition in any election campaign.*” This includes political advertising for which no funds are expended, but solicitation of financial or vote support is made.

Based on these findings staff has determined that, in this instance, failure to timely report contributions and expenditures, report in-kind contributions for legal services, and provide complete sponsor identification on the front page of the Candidate’s Facebook do not amount to actual violations warranting further investigation.

PDC staff is reminding De’Sean Quinn about the importance of accurate and complete disclosure of sponsor identification on all political advertising, as well as the timely disclosure of all contribution and expenditure activities, including the in-kind contributions, and the timely filings of all future PDC reports in accordance with the statutes and 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: De’Sean Quinn