

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to respond to the complaint filed on Aug 13th by Glen Morgan. I have been hired to help perform an audit of Rep. Lovick’s books. In the spirit of providing a quick response to these claims, please know that we have not been able to complete an exhaustive audit of his files but are sending a quick response to meet your requested deadline. If you would need a more thorough, line by line address of his claims, we’d kindly ask for more time. For one, this complaint covers three elections. Two, his daughter, a volunteer treasurer on the campaign, had been seriously ill and working with the PDC throughout her illness to continue providing reports and disclosure. We have been doing our best to re-create the files needed to fully address the claims below. Finally, at first glance, it appears Rep. Lovick’s volunteer treasurer had been reporting the check date and not the received date for these donations. Because of this and the recent Sept 11th filing deadline, we’d request you accept our quick reply below.

Below are our quick responses to his claims:

- 1.) We are confused by the Exhibit A. We have researched several on his list and none of the Date Reported dates match what he is alleging if you look up the contributions on the PDC’s Search Database feature. A few of the donations listed appear to be amended contributions that did not overwrite the original document or post to the correct filer ID, but they were not filed, in some instances, 350 days late. That isn’t accurate.

Several of these contributions that Mr. Morgan claims are extremely late have the wrong Date Reported on them. For example, in his Violation #2 contribution from Polagaya McLaughlin, he reports that the date it was reported was 12/13/2015, but the confirmation report was filed on 2/26/15. The report was <https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100628602>

- [Cash Contributions](#)
- [Inkind Contributions](#)
- [Expenditures](#)
- [Independent Expenditures](#)

LOCAL
Cash Contributions for: LOVICK JOHNNY R

Total Raised: \$105,759.26 Total Spent: \$95,327.54
Total IE Supporting: \$405.50 Total IE Opposing: \$0.00

(Cash Contributions) (Inkind Contributions) (Anonymous) (Personal) (Loans) (Miscellaneous) (Small Contributions)
\$29,325.00 \$8,157.26 \$0.00 \$0.00 \$3,500.00 \$0.00 \$511.00

Select an opponent ▼

NOTE: Click on a column header to sort by that column, or click on the  icon to filter your results 

Drag a column header and drop it here to group by that column

REPORT	NAME	DATE	AMOUNT	P/G	CITY	STATE	ZIP	EMPLOYER	OCCUPATION
Report	MCLAUGHLIN POLAGAYA	10/8/2015	\$100.00	G	MONROE	WA	98272		
Report	MCLAUGHLIN POLAGAYA	1/12/2015	\$50.00	P	MONROE	WA	98272		

Displaying items 1 - 2 of 2

We see the same situation with Mary Lou Eckert, Mr Morgan’s supposed Violation 3. That report was filed on 2/26/15. <https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100628602>, although he claims that it was reported on 12/13/2015. The confirmed report clearly shows it was filed on 2/26/15.

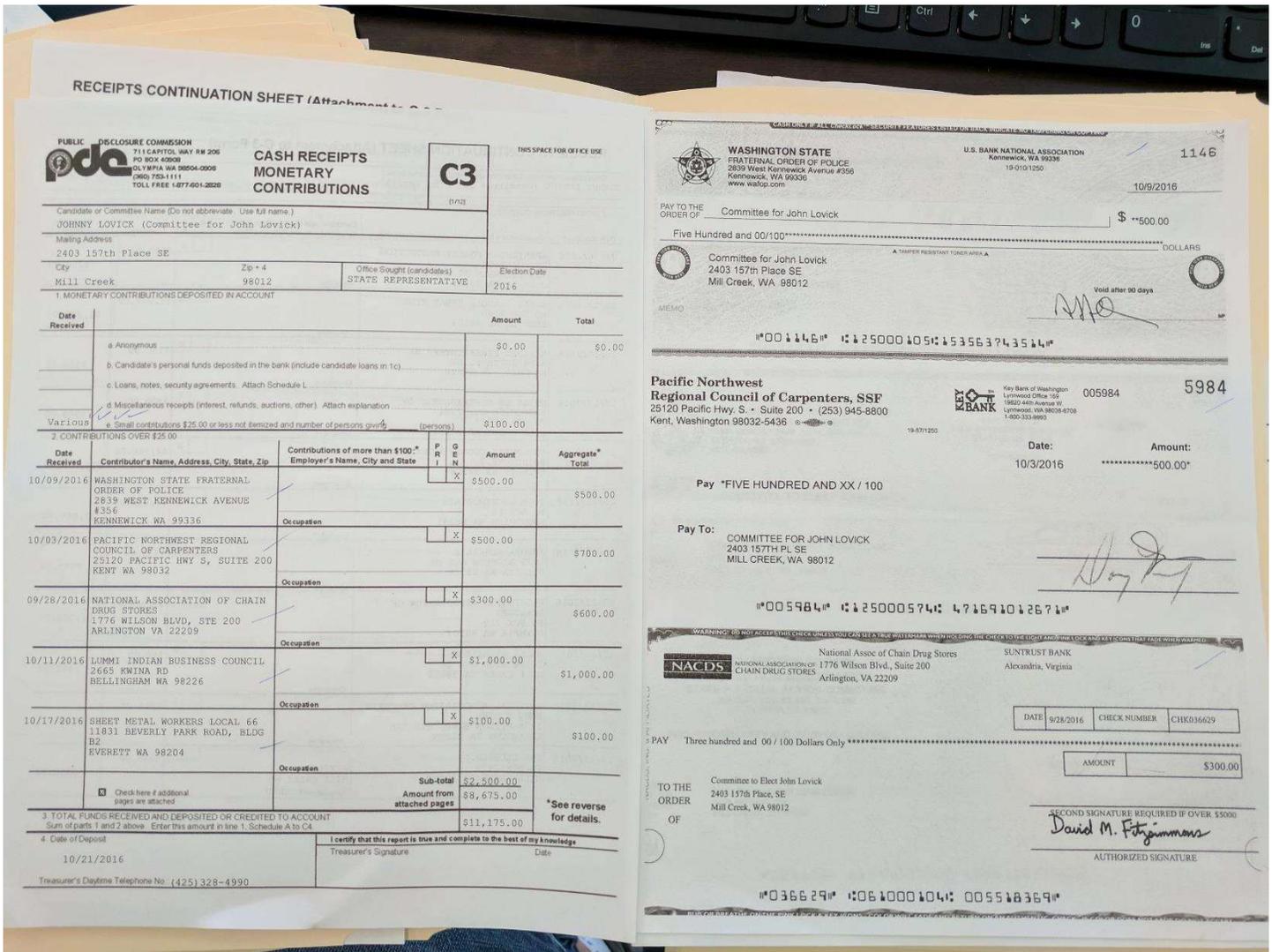
We did not research all 614 of his accusations in Exhibit A. We are confident several, if not most, of these are issues where the treasurer amended an earlier report and that report didn’t overwrite the initial data or posted

to the wrong filer ID – because John Lovick had two open campaign accounts in 2015 – one for Sheriff and one for County Executive.

Mr. Morgan also cites a donation from the Washington State Council of County and City Employees. If you actually review the files these two donations were originally reported on 7/6/2015. <http://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100646053> Therefore, it is not accurate to say that the Lovick campaign waited until Jan 2016 to file it. He had actually filed the donation 5 months earlier, which a simple search would have shown.

- 2.) Many of these expenses were accrued and paid within the same reporting period, particularly the Sept 1 through Oct 17 2016 C4 reporting period. For example, the first alleged Violation on Exhibit C is a cable bill payment to Chinook Consulting on 9/26. As you can see from the invoice image below, the date of that Invoice is 9/20. That order was placed in September, so it was properly reported.

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100728455>



6. Mr Morgan has put these claim on several complaints. After discussions with the Public Disclosure Commission to clarify who should be listed here, it is redundant to put the treasurer and candidate on as committee officers. Additionally, we do not believe that the other folks listed on in this section rise to level of "committee officer." We kindly ask that this allegation be dismissed as it has with several other complaints.

7. Same as Number 6.

8. Mr. Lovick already had a current F1 report on file since he was already an elected official, so his updated F1 report would not have been due within 2 weeks, but rather by April 2016.

9. That is not accurate. Only Sabrina and/or Rep. Lovick made deposits to the account.

10. Treasurers are able to report electronically on behalf of candidates. This claim doesn't make sense.

11. We have books here in my office for the three election years in question. So this claim isn't accurate.

12. These are web videos generated from an iphone and submitted to a Facebook page. Disclaimers aren't required. All TV ads and distributed voter contact had proper disclaimers on them.

Thank you for your opportunity to address these concerns quickly and as thoroughly as possible. Because so much of this is inaccurate or inflated, we haven't been able to address Exhibits A through C on a line by line item basis. We hope you'll consider the above mitigating factors as you proceed with your investigation.

Sincerely,

Jason Bennett, 2018 Treasurer
Committee to Re-Elect John Lovick

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Tue, 19 Sep at 2:20 PM) via Portal [Meta](#)

To Whom it May Concern --

It has come to my attention that Rep. John Lovick has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**.

Rep. John Lovick has apparently violated **RCW 42.17A** as follows:

1) Failure to file accurate, timely C3 & C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidate committees file timely, accurate C3 and C4 reports. Part of the C3 form requires that candidates identify the date a contribution was received.

Unfortunately (and by the candidate treasurer's own admission), Lovick's campaign has habitually identified *the date written on the check as the date the check was received when filling out their C3*.

This means that potentially all of the C3 reports filed by the Lovick campaign were not filled out accurately, resulting in a combined delinquency of well over 1000 days (and counting).

On information and belief, there are other C3 and C4 reports that Lovick has not filed in a timely and/or accurate manner.

The PDC should investigate the possibility that Rep. John Lovick committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**.

If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan
1 Attachment