



**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 28, 2019

Delivered electronically to “franco@workerlaw.com”

Subject: Complaint filed by Glen Morgan, PDC Case 25384

Dear 11th Legislative District Democrats:

Attached 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 warning letter concerning failure to timely designate a replacement Treasurer, update the C-1pc report accordingly, and file subsequent C-3 and C-4 reports. PDC staff expects that the 11th Legislative District Democrats will implement practices to prevent future lapses in Treasurer designation and reporting duties. The Commission will consider the 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 Fox Blackhorn at 1-360-753-1980, toll-free at 1-877-601-2828, or by email at pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director



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January 28, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Glen Morgan, PDC Case 25384

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 21, 2017. Your complaint alleged that the 11th Legislative District Democrats (Committee) 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 Committee, and RCW 42.17A.205 and RCW 42.17A.210 for failure to timely designate a replacement treasurer and report their name and address on a Political Committee Registration (C-1pc report) within 10 days.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; 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:

- On September 7, 2017, the PDC received an e-mail from Robert Howard indicating resignation from the Treasurer position of the 11th Legislative District Democrats effective September 5, 2017.
- The e-mail was sent in lieu of an amended C-1pc report as system limitations do not allow a C-1pc report to be filed without a designated Treasurer’s name and address.
- In accordance with RCW 42.17A.210(3), a successor Treasurer was required to be designated on an amended C-1pc report following the resignation of Robert Howard, and in accordance with RCW 42.17A.205(4) that designation and disclosure was required within 10 days of the change.
- Following the resignation of Robert Howard, the 11th Legislative District Democrats failed to timely file the 21- and 7-day pre-general C-4 reports and 6 C-3 reports required by RCW 42.17A.235; these reports were filed on November 3, 2017, between 3-7 days late, disclosing \$28.04 in contributions and \$605.94 in expenditures before the 2017 General Election.

Based on these findings staff has determined that, in this instance, failure to timely designate a replacement Treasurer, update the C-1pc report accordingly, and file subsequent C-3 and C-4 reports do not amount to actual violations warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), the 11th Legislative District Democrats will receive a formal written warning concerning failure to timely designate a replacement Treasurer, update the C-1pc report accordingly, and file subsequent C-3 and C-4 reports. The formal written warning will include staff's expectation that the 11th Legislative District Democrats implement practices to prevent future lapses in Treasurer designation and reporting duties. 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director

cc: Danielle Franco-Malone, Counsel for the 11th Legislative District Democrats