



**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

March 11, 2019

Delivered electronically to “taki.flevaris@pacificallawgroup.com”

Subject: Complaint filed by Glen Morgan, PDC Case 25124

Dear Marcus Riccelli:

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 the accurate and timely disclosure of all contribution and expenditure activity. PDC staff expects in the future that you will file complete, accurate, and timely reports in accordance with PDC laws 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 pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

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



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March 11, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Marcus Riccelli, PDC Case 25124

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 9, 2017. Your complaint alleged that Marcus Riccelli 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 report debts and obligations; and RCW 42.17A.240 and WAC 390-16-205 for failure to disclose sub-vendors for campaign expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Marcus Riccelli; 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:

- Marcus Riccelli filed two late C-3 reports, between 1-5 days beyond the statutory deadline of RCW 42.17A.235.
- Marcus Riccelli also filed one late C-4 report, 1 day beyond the statutory deadline of RCW 42.17A.235.
- Marcus Riccelli admits that debt for \$1000 in rent should have been reported in August of 2016, after it exceeded \$250, in accordance with the version of RCW 42.17A.240 in effect at the time.
- Marcus Riccelli reported the vendors for each alleged failure to report sub-vendors, and contends that sub-vendors were not utilized for these services.
- Marcus Riccelli acknowledges and accepts responsibility for the non-compliance, and has no prior found violations of PDC laws or rules.

Based on these findings staff has determined that, in this instance, failure to accurately and timely report isolated instances of contribution and expenditure activity, does not amount to an actual violation warranting further investigation.

PDC staff is reminding Marcus Ricelli about the importance of the accurate and timely disclosure of all contribution and expenditure activity. In the future, staff expects that Marcus Ricelli will file complete, accurate, and timely reports in accordance with PDC laws 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 pdcc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

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

cc: Marcus Ricelli