



**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 26, 2019

Delivered electronically to “dtakko@comcast.net”

Subject: Complaint filed by Glen Morgan, PDC Case 25113

Dear Dean Takko:

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 warning letter concerning your failure to accurately and timely disclose contribution and expenditures, including accurate disclosure of debts and expenditure details. Staff expects you to accurately, timely, and completely file all future required reports of contributions and expenditures. 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 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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March 26, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Dean Takko, PDC Case 25113

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 8, 2017. Your complaint alleged that Dean Takko 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 report debts and obligations; and RCW 42.17A.240 and WAC 390-16-205 for failure to accurately detail sub-vendors for expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response(s) provided by Dean Takko; 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:

- Dean Takko operated campaigns for State Representative and for State Senate in 2015 and 2016, and this Complaint concerns allegations in both campaigns.
- Dean Takko filed two late C-3 reports in the 2016 State Senate campaign, disclosing \$6,815, or 5.78% of total contributions, between 3-9 days after the statutory deadline of RCW 42.17A.235.
- The Complaint alleged that 18 reports between both campaigns, which amended previously filed reports, were late reports. The Complaint provided no evidence to show that a material change had been made between report versions.
- Of these 18 amended reports alleged to be violations of RCW 42.17A.235, four of the report numbers provided by the Complaint did not exist, and only report 100725725 altered the underlying report's total activity, with a removal of \$200.68, for -.028% of total expenditures in the campaign for State Representative for 2014.
- In the campaign for State Representative for 2014, Dean Takko filed 4 late C-4 reports in 2014, disclosing \$27,890, for 23.74% of contributions in that election cycle, and \$24,365.97, for 33.53% of expenditures in that election cycle, between 1-4 days after the statutory deadline of RCW 42.17A.235.

- In the campaign for State Representative for 2016, Dean Takko filed 10 late C-4 reports, disclosing \$2,900, for 5.96% of contributions in that election cycle, and \$46,714.08, or 95.97% of total expenditures for that election cycle, between 23-364 days late.
- The entirety of the late reported expenditures in the State Representative race for 2016 was contained on report 100725796 disclosing a \$46,714.08 transfer to Dean Takko's surplus funds account, 29 days after the statutory deadline of RCW 42.17A.235.
- In the campaign for State Senator for 2016, Dean Takko filed 6 late C-4 reports, disclosing \$16,150, or 13.7% of total contributions in that election cycle, and \$16,360.23, or 26.8% of total expenditures in that election cycle, between 1-64 days beyond the statutory deadline of RCW 42.17A.235.
- The Complaint alleged that 39 expenditures should have been reported as orders placed in a reporting period prior to payment. Of these, 22 were orders placed and paid in the same reporting period, thus not reportable under the version of RCW 42.17A.240 in effect at the time.
- Dean Takko amended 17 expenditures on February 22, 2019, that were reportable under the version of RCW 42.17A.240, which required reporting of any orders placed or promises to pay which exceeded \$50 that had been overdue for more than 30 days, or \$250 without any time limitations.
- While the Complaint only addressed a single alleged failure to break down expenditure details in violation of RCW 42.17A.240 and WAC 390-16-205, the Takko campaign worked with PDC staff to identify and amend additional expenditure details to provide the break downs required by WAC 390-16-037 and WAC 390-16-205, in a good-faith effort to come back into compliance.
- Dean Takko 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 contribution and expenditure activity does not amount to an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Dean Takko will receive a formal written warning concerning failure to accurately and timely disclose contribution and expenditures, including accurate disclosure of debts and expenditure details. The formal written warning will include staff's expectation that Dean Takko accurately, timely, and completely files all future required reports of contributions and expenditures. 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 fdc@fdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director

cc: Dean Takko