



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

February 20, 2019

Delivered electronically to "mattloschen@frontier.com"

Subject: Complaint filed by Glen Morgan, PDC Case 25011

Dear Joan McBride:

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 activities. PDC staff expects in the future that you will file complete 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 [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.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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February 20, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Joan McBride, PDC Case 25011

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 Joan McBride 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; RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-205 for failure to provide detailed breakdowns of expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the responses provided by Joan McBride; 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:

- Joan McBride filed one late C-3 report in 2015, disclosing \$950 or 2.24% of all contributions in that year, 57 days beyond the statutory deadline of RCW 42.17A.235, as well as one additional late C-3 report in 2016, disclosing \$75 or 0.06% of all contributions in that year, 2 days late.
- In 2015, Joan McBride filed one late C-4 report, disclosing \$1,400 for retainer payments to McKenna Hartman Consulting, or 49.73% of all expenditures made in that year, 14 days beyond the statutory deadline of RCW 42.17A.235.
- For debts that were allegedly unreported, the McBride campaign has amended necessary reports to show unreported debts, such as victory bonuses, or provided PDC staff with an attestation that each debt was an order placed and paid in the same reporting period, and thus not reportable as debt under the old version of RCW 42.17A.240.
- The McBride campaign amended necessary reports to disclose sub-vendor breakdowns as required by RCW 42.17A.240 and WAC 390-16-205.

Based on these findings staff has determined that, in this instance, failure to timely report an isolated number of contributions and expenditures, and to accurately and completely disclose debts and sub-vendors do not amount to actual violations warranting further investigation.

PDC staff is reminding Joan McBride about the importance of the accurate and timely disclosure of all contribution and expenditure activities, and the complete and 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 [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Joan McBride