



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

January 25, 2019

Delivered electronically to "mickimck@charter.net"

Subject: Complaint filed by Glen Morgan, PDC Case 24464

Dear Benton County Democrats:

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 timely disclosure of all contribution and expenditure activities, and the timely filings of all future PDC reports in accordance with the statutes 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](mailto: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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January 25, 2019

Delivered electronically to “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaint regarding Benton County Democrats, PDC Case 24464

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 17, 2017. Your complaint alleged that Benton County Democrats 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 to break down expenditure details in accordance with WAC 390-16-037; RCW 42.17A.205 for failure to accurately and completely report all committee officers on the Political Committee Registration report (C-1pc report); and RCW 42.17A.425 for allowing individuals not disclosed on the C-1pc to authorize expenditures.

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:

- The alleged violations of RCW 42.17A.235 for failure to timely file C-3 and C-4 reports, which occurred in 2016, were addressed by the March 7, 2017, Final Order of the Public Disclosure Commission in PDC Case 2603.
- The remaining alleged violations of RCW 42.17A.235 were for a suspended portion of the penalty not required to be reported as debt unless the suspension criteria were not met, and two remaining expenditures totaling \$141.78, or 0.59% of their total expenditures in 2017.
- Insufficient evidence was provided to support the allegation that all members of the Executive Board should have been listed on the C-1pc in accordance with RCW 42.17A.205 and WAC 390-05-245.
- No evidence was provided to support the allegation that the members of the Executive Board not listed on the C-1pc authorized expenditures in violation of RCW 42.17A.425.

Based on these findings staff has determined that, in this instance, failure to timely file a single C-4 report of contributions and expenditures does not amount to an actual violation warranting further investigation.

PDC staff is reminding the Benton County Democrats about the importance of the timely disclosure of all contribution and expenditure activities, and the timely filings of all future PDC reports in accordance with the statutes 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 e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

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

Endorsed by,

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

cc: Benton County Democrats