



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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**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)**

September 14, 2021

Delivered electronically to [krystal4burien@gmail.com](mailto:krystal4burien@gmail.com) and [jason@argo.us](mailto:jason@argo.us)

Subject: PDC Case 95991

Dear Krystal Marx:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed July 12, 2021 with the Public Disclosure Commission (PDC) alleging violations of RCW 42.17A.235 and .240 for failure to timely register with the PDC and timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports.

As noted in the letter below, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into the allegations or take further enforcement action in this matter.

PDC staff reminds you about the importance of timely and accurately filing with the PDC and staff expects in the future you will timely and accurately file reports, and list full sponsorship information on political advertising in accordance with PDC laws and rules.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s

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Alice Fiman  
Compliance Officer

/s

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Kim Bradford  
Deputy Director  
For Peter Lavallee  
Executive Director



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September 14, 2021

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

Subject: Complaint regarding Krystal Marx, PDC Case 95991

Dear Glen Morgan:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed July 12, 2021. The complaint alleged Krystal Marx, a 2021 candidate for Burien City Council, Position 5, violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures on Monetary Contributions(C-3) reports and Full Summary Contributions and Expenditures (C-4) reports.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, the evidence provided in the complaint and a response from Jason Bennett, campaign consultant, to determine whether the record supports a finding of one or more violations. We found the following:

- Krystal Marx registered with the PDC as a 2021 candidate for Burien City Council, Position 7, on January 9, 2018 and amended the registration on January 4, 2021.
- The Candidate registration filed by the Friends of Krystal Marx (Campaign) listed one officer, Jason Bennett, identified as a treasurer and consultant.
- In its most recent C-4 report, the Campaign timely filed the 7-Day Pre-Primary C-4 report filed on July 27 and amended August 5, 2021, disclosing \$18,242.28 in total contributions, \$12,988.74 in expenditures, \$3,998 in liabilities, and a \$1,255.54 balance.
- As noted in the complaint, PDC staff investigated the Marx campaign's \$250 debts and orders placed. This investigation, PDC Complaint 72721, noted the requirement to disclose debts and obligations once it has exceeded the \$750 threshold. PDC staff dismissed the allegation.
- In his response to the current complaint, PDC Case 95991, Bennett cited RCW 42.17A.240 (9)(a), which states 'the name and address of any person and the amount owed for any debt with a value of more than seven hundred fifty dollars that has not been paid for any invoices submitted, goods received, or services performed, within five business days during the period within thirty days before an election, or within ten business days during any other period.'

- Bennett stated the total debt is exactly \$750, three payments owed of \$250 each, so there is no debt reporting disclosure requirement for the Campaign. He added that the “reason it isn’t showing is because the PDC ORCA software (which we are not using anymore and have moved to vendor software) still shows debts of \$250 and more while vendor software is only showing debts of more than \$750.”
- In response to the allegation the Campaign website does list full sponsorship information and was not reported as an expenditure, Bennett stated the sponsor identification or “Paid for by disclaimer is showing on the website” however the Campaign PO Box address was missing and that has now been updated. He apologized for the oversight and stated “the website was updated by Krystal from her 2017 race. So the domain name and website hosting are a total of \$129.79 and we amended her C4s to reflect that small in-kind donation.”
- The C-4 report was initially timely filed by the Campaign on March 9, 2021 covering February 1 – 28, 2021, was amended by the Campaign on August 5, 2021, adding the \$129.79 in-kind contribution from Ms. Marx for the Campaign ‘website hosting/renewal (Wix).’

Based on these findings and the fact the Campaign took prompt action to comply, PDC Staff has determined the alleged non-compliance that appears to constitute violations of PDC laws and rules made by Krystal Marx are remedial in nature, and do not warrant further investigation or enforcement action. They involved expenditures total no more than \$500, occurred more than 30 days before the election, were inadvertent and minor in nature, and did not materially affect the public interest. Krystal Marx took corrective action as required by law for a remedial violation and Krystal Marx also substantially met all other required filing due dates within the previous 12-month period.

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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Alice Fiman  
Compliance Officer

/s

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Kim Bradford  
Deputy Director  
For Peter Lavalley  
Executive Director