



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 • Website: www.pdcc.wa.gov

April 26, 2023

Delivered electronically to Paul Dillon

Subject: Complaint filed by Glen Morgan, PDC Case #123533

Dear Mr. Dillon:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) on March 20, 2023.

As noted below in the letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this letter constitutes a formal written warning concerning your failure to timely and accurately disclose reportable information related to assets owned by you and your spouse, real estate owned by your spouse, and business associations of your spouse. The Commission will consider the 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 Tanya Mercier, Compliance Officer, by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

/s/ Electronically Signed

Tanya Mercier
Compliance Officer

/s/ Electronically Signed

Peter Frey Lavalley
Executive Director



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 • Website: www.pdcc.wa.gov

April 26, 2023

Sent electronically to Glen Morgan

Subject: Complaint regarding Paul Dillon, PDC Case #123533

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint filed on March 20, 2023. The complaint alleged that Paul Dillon may have violated RCW 42.17A.710 by failing to accurately disclose personal financial information, including spousal information, on the Personal Financial Affairs Statement (Form F-1) covering March 2022 to March 2023.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On March 16, 2023, Mr. Dillon filed a Candidate Registration declaring his candidacy for election to the City of Spokane Council, selecting the Full Reporting option, and listing Geoffrey Bracken as Ministerial Treasurer of his campaign.
- On March 12, 2023, Mr. Dillon timely filed a Personal Financial Affairs Statement for the period March 13, 2022 – March 12, 2023.

- On March 30, 2023, Mr. Dillon was notified of your complaint, and on April 12, 2023, Mr. Dillon revised his F-1 to accurately disclose reportable information related to assets owned by him and his spouse, real estate owned by his spouse, and business associations of his spouse.
- In his response to the complaint about the nondisclosure of this reportable information, Mr. Dillon explained: “Originally, I received an error message when listing my spouse, Tiffany Harms, on my initial filing. There is not much information to report, she only recently began Juno Collaborative and has taken on small clients.”
- On August 6, 2021, Mr. Dillon was listed as a Co-Director on the registration for the 509 Forward PAC. Upon becoming a candidate for the Spokane City Council race, Mr. Dillon gave up his position with the PAC and has subsequently been removed from the PAC registration record. Mr. Morgan alleges that Mr. Dillon had an obligation to report on his candidate F-1 the officer position he held with the 509 Forward PAC. The PDC’s understanding and historical enforcement of RCW 42.17A.710(8) does not support Mr. Morgan’s allegation. The code language states, “corporation, partnership, joint venture, association, union, or other entity” and does not specifically identify political committee as an entity for which candidates or officials must report their relationship on an F-1. The parallel structure of the language in the series is important to understanding who must report within the context and purpose of this requirement. A political committee is not analogous to any of the entities listed in the series, therefore it does not fit into the “other entity” category either. Based on this analysis, the PDC has determined an officer of a political committee is not disclosable on the F-1. But a political committee must be registered with the PDC and through that registration, officer information is available to the public to review on the PDC website.

While staff found Mr. Dillon’s F-1 report included deficiencies, he fully cooperated with PDC staff during its review and took responsibility for the deficiencies by amending the F-1 report to include reportable information.

Based on these findings, staff has determined that in this instance, the failure to include all reportable information on Mr. Dillon’s F-1 Report covering 2022 activity does not amount to a finding of a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), Mr. Dillon will receive a formal written warning concerning his failure to timely and accurately disclose reportable information related to assets owned by him and his spouse, real estate owned by his spouse, and business associations of his spouse. 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 Tanya Mercier, Compliance Officer, by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by:

/s/ Electronically Signed

Tanya Mercier
Compliance Officer

/s/ Electronically Signed

Peter Frey Lavalley
Executive Director

cc: Paul Dillon