



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.pdca.wa.gov

June 7, 2019

Delivered electronically to Sharon Sumpter, with Represent Okanogan County

Subject: Complaint filed against Represent Okanogan County, PDC Case 29501

Dear Ms. Sumpter:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) against Represent Okanogan County. As noted below in the letter to Mr. Morgan, the PDC 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) PDC staff is hereby formally warning Represent Okanogan County and its Officers concerning the importance of timely registering as a political committee and timely filing the required C-3 and C-4 reports disclosing contribution and expenditure activities in accordance with PDC laws, rules and reporting requirements for a political committee. This formal written warning includes staff's expectation that Represent Okanogan County and its Officers will timely register and report as a political committee, if its Officers register another political committee in the future under the Full Reporting Option, including adhering to the anonymous contribution limits. The Commission will consider this 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 has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact Kurt Young at 360-664-8854, toll-free at 1-877-601-2828 or by e-mail kurt.young@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/_____
Kurt Young, Compliance Officer

s/_____
Peter 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.pdca.wa.gov

June 7, 2019

Sent electronically to Glen Morgan

Subject: Complaint filed against Represent Okanogan County, PDC Case 29501

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on December 21, 2017 against Represent Okanogan County, a single year political committee registered with the PDC. The complaint alleged Represent Okanogan County (Committee) may have violated RCW 42.17A.235 and .240 by failing to timely file Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities, including the reporting of debts, and providing a more detailed description of expenditures and identifying any sub-vendors that provided goods or services to the Committee.

PDC staff reviewed the allegations listed in the complaint you filed, the statutes, rules and reporting requirements for a political committee, queried the PDC contribution and expenditure database for Committee information, reviewed the Committee Registration (C-1pc report), C-3 and C-4 reports filed by the Committee, and the response to the complaint provided by Committee Officers. Based on staff's review, we found the following:

- On August 29, 2016, the Committee filed a C-1pc report with the Public Disclosure Commission (PDC) as a first-time, new, single year political committee for 2016, selecting the Full Reporting Option, and listing Gay Northrup as President, Stuart Gillespie as Treasurer, and Sharon Sumpter as Secretary. News coverage indicated the Committee was started in 2015 to bring attention to Okanogan County issues, increase public involvement in the political process and encourage people to run for office and vote.
- Based on the October 22, 2015 date when the Committee received two \$50 contributions from two individuals, the C-1pc report was due to have been filed no later than November 5, 2015. The Committee filed the C-1pc report 298 days late.
- On August 30, 2016, the Committee filed 13 initial C-3 reports and seven initial C-4 reports covering the period December 1, 2015 through July 25, 2016 and disclosing \$9,611 in contributions received and \$5,782 in expenditures made. The Committee's initial C-3 report disclosed \$1,330 in monetary contributions had been received between October 22-26, 2015 and deposited into the Committee bank account on December 8, 2015.

- The Committee timely filed the 21-Day and 7-Day Pre-General Election C-4 reports for the 2016 election. The Committee filed 11 amended C-3 and C-4 reports electronically, all prior to the complaint being filed, and appears to have timely updated the information previously disclosed on the reports as they were provided or became aware of additional information.
- The Committee disclosed receiving a total of \$13,367 in monetary contributions received and expenditures made.
- The Committee disclosed receiving \$1,250 in anonymous contributions for the 2016 election cycle, which exceeded the \$300 anonymous contribution limits by \$950. PDC staff advised the Committee concerning the anonymous contribution limits and questioned whether the Committee could determine the source of anonymous or unidentified contributions that exceeded the \$300 limit. Staff advised the Committee that any anonymous contributions in excess of \$300 that cannot be identified "*shall escheat to the state and shall be paid to the state treasurer for deposit in the state general fund.*"
- The Committee was unable to identify the source of the contributors that exceeded the anonymous limits, and the PDC received a \$950 check from the Committee on October 7, 2016, designated for the state general fund.

Based on these findings, and the facts that Represent Okanogan County: (1) was a first-time committee with limited knowledge of the PDC reporting requirements; (2) timely filed the 21-Day and 7-Day Pre-General Election C-4 reports; (3) was a small, unsophisticated, all-volunteer committee with less than \$13,400 in total expenditures made to run a local political committee; and (4) timely sent a \$950 check when made aware of the anonymous contribution limits to resolve that issue; in this instance, the failure to timely register as a political committee and file C-3 and C-4 reports as a political committee does not amount to a finding of an actual violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d) PDC staff is formally warning Represent Okanogan County and its Officers concerning the importance of timely registering as a political committee, and timely filing C-3 and C-4 reports disclosing contribution and expenditure activities as required by PDC laws, rules and reporting requirements for a political committee. The formal written warning will include staff's expectation that Represent Okanogan County and its Officers will timely register and disclose its contribution and expenditure activities as a political committee, if its Officers register another political committee under the Full Reporting Option in the future. 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 has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact Kurt Young at 664-8854, toll-free at 1-877-601-2828 or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/_____
Kurt Young, Compliance Officer

s/_____
Peter Lavalley, Executive Director

cc: Represent Okanogan County