

September 9, 2023

Public Disclosure Commission
Compliance Office
RE: Case Number **141449**

Attention Phil Stutzman (Compliance Officer):

This is in response to a complaint received by Glen Morgan on August 18, 2023.

Complaint #1 – Attempting to conceal the truth about political activity from the public by waiting weeks, months, or more to report what they did or who funded them (Violation RCW 42.17A.235, RCW 42.17A.240)

RESPONSE:

Our non-exempt account was previously mini reporting, which does not require filing reports of contributions and expenditures. We complied with the mini-reporting requirements of the PDC by maintaining thresholds for raising, spending, and individual contribution amounts. Cheryl Hammer, former Treasurer, kept accurate records of our contributions and expenditures, as per PDC guidelines. When Carol Brock, chairperson, submitted a request to the PDC in April of 2023 to move the non-exempt account from mini to full reporting, the PDC instructed us to submit C-3 and C-4 reports dating back to January 1, 2023. Cheryl Hammer then proceeded to file the required reports. After these records were filed and reviewed by the PDC, the PDC granted permission to move from mini to full reporting via the following email:

“This is notification that your August 17, 2023, request to change to the Full Reporting option has been approved by Peter Lavalley, Executive Director of the Public Disclosure Commission. Per WAC 390-16-125(3), the committee now permitted to raise and spend more than \$7,000 in this calendar year, and to accept more than \$500 in the aggregate from a single contributor. Please update their C-1pc political committee registration to show full reporting.”

Complaint #2 – Failure to timely update C1PC to include current officers, essentially keeping the true officers of this PAC secret from the public (Violation of RCW 42.17A.205(2))

RESPONSE:

The registration with the PDC was updated timely and accurately when there was a change in officers of our organization (i.e., resignations of Pete and Cheryl Hammer and name change for McHale). We updated the PDC registration when the transfer of officers was made on June 23, 2023. The reason for the mismatch with the "Lewis County Democrats" website, as mentioned in the complaint, is because our website was not updated to reflect the changes. The registration information with the PDC correctly lists our current officers. We are working with our website administrator to have our officer list updated as soon as possible.

Complaint #3 – Failure to list the vendor and the address of the vendor for in-kind contributions, therefore concealing from the public the true source of these contributions (Violation of RCW 42.17A.240, RCW 42.17A.235)

RESPONSE:

When entering records for in-kind donations, there is no field in the ORCA program to specify where vendor receipts are from. We were specifying vendors in the description, but now are also including business addresses in those descriptions. We have not had any auctions, nor have we resold any in-kind donation items. In addition, in consulting with staff on the PDC, the address for Vendors is a "suggestion." However, we have added those addresses and are now current and will do this going forward.

Thank you for the opportunity to respond to these complaints. If you have any questions, please feel free to contact me via email lewiscodemocratswa@gmail.com

Regards,

Carolyn Brock
Chair – Lewis County Democratic Central Committee