



State of Washington
PUBLIC DISCLOSURE COMMISSION

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February 4, 2025

Delivered electronically to ghdemocrats@gmail.com

Subject: Complaints filed by Glen Morgan and Conner Edwards, PDC Case 141468

Dear Grays Harbor Democrats:

Below is a copy of an electronic letter sent to Glen Morgan and Conner Edwards concerning complaints filed with the Public Disclosure Commission (PDC).

On December 29, 2024 and December 30, 2024 respectively, Grays Harbor Democrats completed a *Statement of Understanding* (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and .240 for failing to timely file the Post-Primary C-4 report and 21-day pre-General C-4 report for election year 2022, which collectively disclosed \$6,105.84 in General election-related expenditures after the General election. The \$300 penalty assessed resolves the two late C-4 reports for election year 2022 indicated above.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to timely file C-3 reports and the other late C-4 reports indicated herein, and maintain financial records as noted in the enclosed letter sent to Mr. Morgan and Mr. Edwards. In the future, PDC staff expect you to timely and accurately file all required C-3 and C-4 reports disclosing the committee's contributions and expenditures, especially during the time-sensitive periods prior to elections; and 2) preserve the committee's books of account, bills, receipts, and other financial records, including its ORCA files, for no less than five calendar years. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is reminding you about the importance of sufficiently disclosing expenditure descriptions on C-4 reports, including, but not limited to, details regarding radio ads, TV ads, printed materials, the full name of candidates to whom contributions are made, and the vendors for reimbursed expenditures. PDC staff expect that, in the future, you will timely and accurately disclose the above information in accordance with PDC laws and rules and guidance.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley

Peter Frey Lavalley
Executive Director



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February 4, 2025

Delivered electronically to glen@wethegoverned.com and cg.edwards53@gmail.com

Subject: Complaints regarding Grays Harbor Democrats, PDC Case 141468

Dear Glen Morgan and Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaints filed by Mr. Morgan on August 18, 2023 and August 28, 2023 and the complaints filed by Mr. Edwards on May 27, 2024 and November 12, 2024.

- The complaints filed by Mr. Morgan alleged that Grays Harbor Democrats, a bona-fide county non-exempt party committee, may have violated RCW 42.17A.205(5), 235 and .240 by failing to timely update its *Committee Registration* (C-1pc report) to disclose the name of its sponsor in 2023, and timely and accurately file C-3 and C-4 reports disclosing contributions and expenditures for election years 2018-2022, including incomplete or inaccurate descriptions of expenditures and for a contribution received in 2018.
- Mr. Edwards' complaint alleged that Grays Harbor Democrats may have violated RCW 42.17A.235 and .240 by failing to timely and accurately file C-4 reports for election year 2023, and C-3 and C-4 reports for 2024, including an incomplete description for an advertising expenditure made in 2024.

PDC staff reviewed the allegations and evidence submitted; the applicable statutes, rules, and reporting requirements; the responses provided by Grays Harbor Democrats (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.

Applicable Laws & Rules

- [RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on its C-1pc report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee's election participation, and its financial activity.
 - If a committee is sponsored pursuant to [WAC 390-16-011A](#), the sponsor's name shall be included in the name of the sponsored committee on the C-1pc report.

- Pursuant to RCW 42.17A.205 and [WAC 390-16-011A](#), a committee that is not organized to support or oppose a particular candidate or ballot proposition is required to amend their C-1pc report within 60 days of an election in which they participate to include the name of their sponsor if the committee received 80% or more of their contributions from a person¹ or the person's members, officers, employees or shareholders during the twelve months previous to 60 days before the election.
- [RCW 42.17A.005\(38\)](#) defines "participate" to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).
- Per RCW 42.17A.235(8), a committee's treasurer is required to preserve books of account, including ORCA files, bills, receipts, and all other financial records of the campaign or political committee for no less than five calendar years following the year during which the transaction occurred, if not longer as otherwise required by law.
- Pursuant to RCW 42.17A.240(2), monetary contributions are disclosed on C-3 reports, which must include, but are not limited to: 1) the name and address of each person who contributed more than \$100² during the period covered by the report; 2) the monetary value and date of each contribution; and 3) the aggregate value of all contributions received from each person during the campaign. "Contribution³," as defined, includes an in-kind contribution, which is disclosed on a C-4 report.
- Pursuant to RCW 42.17A.240(7), expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made in the aggregate of more than \$200⁴ during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures. Purpose description details should state the goods or services provided by the vendor, including the number of items purchased, identify any candidates or ballot propositions supported or opposed by the expenditure, and the name & address of any sub-vendors used. For advertising expenditures, filers should describe the type and number of ads, where they appeared or were broadcast, and when (e.g. run dates).

¹ Person" includes "an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized." [RCW 42.17A.005\(39\)](#).

² Per [WAC 390-05-400](#), this dollar amount increased from \$25 to \$100 effective April 1, 2023.

³ [RCW 42.17A.005\(15\)\(a\)](#) defines a "contribution" to include a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, transfer of funds or anything of value, including personal and professional services for less than full consideration. [WAC 390-05-210\(1\)](#) further defines "contribution" to include, but not be limited to, furnishing services, property, or rights on an unequal basis or at less than fair market value for the purpose of assisting any candidate or political committee, and refers to the latter as an "in-kind contribution."

⁴ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- RCW 42.17A.235(10) requires the submission of amended C-3 and C-4 reports within 21 days of filing the original report. If there is no pending complaint about the report being amended and it meets the conditions set forth in .235(10)(a) through (d), it is not evidence of a violation to submit an amended report within 21 days of the original report.
- Per [RCW 42.17A.770](#), any action brought under Chapter 42.17A must be commenced within five years after the date the violation occurred.
- For the purpose of assessing base penalty amounts, [WAC 390-37-143\(1\)](#) states “occasion” means an “established violation” and “only violations in the last five years will be considered for the purpose of determining second and third occasions” of a violation.

Background & Findings

Based on PDC staff’s review, we found the following:

- The Respondent committee first registered with the PDC as a political committee in 2012. Prior to this complaint being filed, the Respondent’s most recent C-1pc amendment was filed on January 10, 2023. The committee selected the Full Reporting option on the January 10, 2023 report and did not list any affiliated committees or identify a sponsor in its name. The committee amended its report again on December 16, 2023 to update its telephone number and officer information.
- On September 7, 2023, the committee responded to the complaint allegations from Mr. Morgan by email and acknowledged some mistakes were made. The Respondent said they are a very small volunteer-run organization that does the best it can, wants to be transparent, and is constantly trying to do better with their limited resources. The committee said they are seeking out more training and volunteers to help prevent future issues. They added that their new Treasurer has reviewed the PDC’s resources and would receive compliance training through their state party.
 - The committee agreed that the PayPal contribution reported in 2018 should have been disclosed differently but noted that the committee’s current Board was not involved in the party at that time and may face challenges resolving this entry.
 - The Respondent disputed your allegations that the committee 1) failed to identify itself as a sponsored committee because it received 100% of its funding from 24th Legislative District Democrats; and 2) participated in the 2023 Primary Election, which the committee described as “factual errors.” The committee said it did not participate in the Primary Election and had received contributions from other sources as of the start of 2023.
 - The committee acknowledged that it should have reported more details regarding their radio advertising and Biden/Harris signs, said they would gather information and amend the reports, and appreciated the opportunity to fix their mistakes. The Respondent indicated their belief that they had reported sufficient details for the reimbursements to Vini Samules, which appears to have been based on a good-faith misunderstanding regarding the need to report vendor details for reimbursements.

- The Respondent said Mr. Morgan's characterization of the committee as an intentional and malicious lawbreaker whose late reports and incomplete expenditure details were an attempt to conceal political activity are simply not true.
- Throughout our investigation, the Respondent was responsive to PDC requests and demonstrated a willingness to conduct research to obtain information regarding expenditure details to facilitate the amendment of reports.
- A Case Status Review (Initial Hearing) was held for this case on November 16, 2023.
- On June 27, 2024, the committee responded to the first complaint filed by Mr. Edwards and indicated their late reports were the result of a lack of access to their PDC account following a Treasurer transition. The Respondent reached out to PDC for assistance and said the issue was resolved internally by PDC staff.
- On November 25, 2024, the committee responded to the second complaint filed by Mr. Edwards and said they understand his purpose in filing complaints with the PDC, but inundating the agency with complaints prevents them from assisting Respondents, resolving cases, and making the changes for which the Complainant purportedly files such complaints. The Respondent indicated they have addressed the alleged violations to the best of their ability, did not intentionally violate reporting requirements, which were the result of human error, and asked for grace to be extended.
- The Respondent does not have previous warnings/violations of PDC requirements for activity that occurred within the last 5 years.
- The prior case ([26838](#)) Mr. Morgan alleged in his complaint concerned alleged violations of RCW 42.17A.235 & .240 made in 2017 for activity that occurred 2016-2018, which is outside our 5-year statute of limitations. Therefore, the existence of prior enforcement is an aggravating factor in this case but is not a first occasion of a violation pursuant to WAC 390-37-143(1) for purposes of determining a penalty in this case.

Allegation: Failure to Identify Sponsor in Committee Name (2023)

The first complaint filed by Mr. Morgan specifically alleged that the Respondent failed to amend the name on their C-1pc report to include the name of their sponsor in 2023, which he identified as 24th Legislative District (LD) Democrats. As evidence, Mr. Morgan referenced a \$1,000 contribution the Respondent received from 24 LD Democrats on 1/9/23, which he alleged constituted 100% of the Respondent's funding ([C-3 report 110132765](#)).

Sponsorship is tied to two dates: 1) when the committee registered; and 2) 60 days prior to an election. Our records show the committee updated its registration on 1/10/23 and did not participate in the 2023 Primary election. As a result, the 12-month period for which this sponsorship allegation applies is 1/11/22-1/10/23. According to its reports, the Respondent committee received a total of \$18,354 in contributions during this 12-month period and the \$1,000 contribution from the 24th LD Democrats comprised approximately 5.4% of total contributions. Most of the committee's monetary contributions during this period (79%) were generated by low cost and other fundraisers. Since the committee did not receive 80% or more of

its contributions from the 24th LD Democrats (or any other contributor) during the specified 12-month period, this allegation is unfounded and dismissed.

Allegation: Late Reporting (2019-2024)

The complaints filed by Mr. Morgan alleged the Respondent filed late C-3 & C-4 reports for election years 2018-2022 whereas the complaints filed by Mr. Edwards alleged late reporting for election years 2023-2024. Reports due in election year 2018 and 2019 now fall outside of the five-year statute of limitations set forth in RCW 42.17A.770 for enforcement. Therefore, our findings below concern original late reports submitted for the 2019 General Election through the end of November, 2024:

2019

- The committee's 7-day pre-General, post-General, and End-of-Election cycle C-4 reports were filed 16-58 days late. The 7-day report was filed after the General election, but all three reports are partially mitigated by a lack of election-related expenditures.
- Two C-3 reports for December were filed 54 days late.

Mr. Morgan also alleged that two amended May C-3 reports, and the amended May C-4 and 21-day pre-General C-4 reports were filed late but did not indicate what changed on these amended reports that made them late. Since the content and timing of amended reports determine whether they are late, this allegation was dismissed.

2020

- The February C-4 report was filed 5 days late but is partially mitigated by a lack of election-related expenditures. The January C-4 report alleged in the complaint was not late because the committee did not meet the \$200⁵ reporting threshold that was in effect at the time.
- Three C-3 reports were filed 3-10 days late.
- The committee's March monthly, 21-day pre-General, and 7-day pre-General C-4 reports were untimely amended per the PDC's request to add expenditure details.

2021

- The committee's 21-day pre-General C-4 report was filed 13 days late, before the General election, and disclosed a \$100 contribution to "Alan for Aberdeen" (candidate Alan Richrod). The report was untimely amended per the PDC's request to add expenditure details.
- The committee's January, April, May, post-Primary, post-General, and End-of-Election cycle (Dec.) C-4 reports were filed 2-49 days late. The post-General report is mitigated by a lack of financial activity, and the other five reports are partially mitigated by a lack of election-related expenditures. The March C-4 report alleged in the complaint was not late because the \$200 reporting threshold in effect at the time was not met. The post-

⁵ Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

Primary C-4 report was untimely amended per the PDC's request to add expenditure details.

- Ten C-3 reports were filed 2-84 days late.

2022

- The committee's 21-day pre-Primary C-4 report was filed 17 days late, before the Primary election, and disclosed a \$100 contribution to candidate Dan Lindgren.
- The 7-day pre-Primary C-4 report was filed 3 days late, before the Primary election, and is mitigated by a lack of financial activity.
- The Post-primary C-4 report was filed 115 days late, after the General election, and disclosed one General election-related expenditure of \$498.22 for printed material. The report was untimely amended per the PDC's request to add expenditure details, which revealed that the printed material consisted of fliers for fair/doorbelling that included support for candidates Derek Kilmer, Mike Chapman, and Steve Tharinger. These details regarding the General election-related expenditures were reported after the election, which is an aggravating factor. The late-reported election-related expenditures comprised about 2% of the committee's total expenditures for 2022.
- The 21-day pre-General C-4 report was filed 79 days late, after the General election, which is an aggravating factor. The original report disclosed \$1,992, \$2,000, and \$1,008 in radio advertising expenditures and \$607.62 for literature. The report was untimely amended per the PDC's request to add expenditure details, which revealed the literature consisted of handout cards for canvassing that included support for candidates Derek Kilmer, Mike Chapman and Steve Tharinger. These late-reported election-related expenditures comprised approximately 27% of the committee's total expenditures for 2022.
- The 7-day pre-General C-4 report was filed 65 days late, after the election, and is mitigated by a lack of financial activity.
- The January, March, April and post-General C-4 reports were filed 23-52 days late. All four reports are partially mitigated by a lack of election-related expenditures. The May C-4 report alleged in the complaint was not late because the committee did not meet the \$200 reporting threshold that was in effect at the time.
- Eight C-3 reports were filed 4-121 days late.

2023

- The committee's March, April, June, and July monthly C-4 reports were filed 13-135 days late, and partially mitigated by a lack of election-related expenditures. The February and May C-4 reports were not late because the committee did not meet the respective \$200 and \$750 reporting thresholds. The August C-4 report was timely filed and untimely amended to add expenditure details.

- The committee filed a single C-4 report covering September-December of 2023 disclosing \$3,910.95 in contributions and \$1,311.27 in expenditures 74-114 days late. One of the two late reported deposits is partially mitigated by the committee's timely filed C-3 report disclosing the contributions. Late reported expenditures are partially mitigated by a lack of election-related spending. Expenditures for December were timely disclosed on this report. The C-4 report was amended once with no material changes.
- Four C-3 reports were filed 9-135 days late.

2024

- The committee's August C-4 report was filed 1 day late, and partially mitigated by a lack of election-related expenditures. Monthly C-4 reports for January, March, and April were not late because the committee did not meet the \$750 reporting threshold.
- Two C-3 reports were filed 11-34 days late.

Allegation: Inaccurate Contributor Name on a C-3 Report (2018)

The second complaint from Glen Morgan alleged that the Respondent failed to correctly identify the source of a \$1,177 contribution made on 3/14/18 and reported on 9/17/19 because "Transfer from PayPal Account" was entered on the C-3 report instead of the name and address of the contributor. PayPal is an online payment processor and was not the contributor.

The Respondent was unable to correct the C-3 report per the PDC's request because it no longer has access to, or the ability to amend, its ORCA (online reporting) account records for election year 2018. The Respondent contacted previous committee leaders, who confirmed the \$1,177 amount was comprised of membership dues. They also contacted PayPal directly but the transactional details provided to the committee were not sufficient to reconcile the committee's underlying records so the information could be properly disclosed to the PDC.

The inaccurate contribution information reported in 2019 is outside the five-year statute of limitations in RCW 42.17A.770 for enforcement. That being said, the committee's failure to preserve adequate ORCA and underlying financial records prevented it from being able to resolve this allegation.

Allegation: Missing Expenditure Details on C-4 Reports (2020-2022 and 2024)

The complaints from Glen Morgan and Conner Edwards collectively alleged the Respondent failed to provide sufficient expenditure details on C-4 reports filed for election years 2020, 2022, and 2024. Specific allegations included failure to 1) identify a civil penalty paid to the PDC in 2020; 2) disclose sufficient details regarding radio advertising expenditures incurred in 2020 and 2022; 3) disclose sufficient details regarding Biden/Harris yard signs in 2020; 4) properly report two reimbursements to Samuel Vini for printed literature in 2022; and 5) disclose sufficient details regarding radio advertising expenditures made in October of 2024.

The following C-4 reports were amended to resolve the above allegations:

2020

- March C-4 report to include description of PDC penalty ([report 110210293](#))

- 21-day pre-General C-4 report (9/1-10/12) to include details for Alpha Media and Jodesha Broadcasting radio ads, and remove a duplicate entry for Alpha Media, ([report 110216305](#))
- 7-day pre-General C-4 report (10/13-10/26) to include number of Biden/Harris yard signs ([report 110216306](#))

2022

- Post-Primary C-4 report (7/26-8/31) to include details for reimbursement to Samuel Vini for literature (fliers) purchased at Staples ([report 110210290](#))
- 21-day pre-General C-4 report (9/1-10/17) to include details for Jodesha Broadcasting and Alpha Media radio ads, reimbursement to Samuel Vini for literature (handout cards) purchased at Staples ([report 110222590](#))

2024

- October C-4 report to include details for Alpha Media radio and TV ads, and video production. ([report 110261070](#)). The Respondent confirmed no sub-vendors were used.

The Respondent also voluntarily amended expenditure descriptions on C-4 reports for election year 2021, 2022 and 2023 to include additional details that were not alleged in the complaints.

Summary and Resolution

Two C-4 reports containing election-related expenditures for 2022 were filed after the elections, thereby depriving the public of information during a time-sensitive period in the election cycle, which is an aggravating factor. As mentioned previously, prior PDC Case 26838 for activity that occurred outside the 5-year statute of limitations is also an aggravating factor.

Mitigating factors in this case include the size and sophistication of the committee and their relatively modest expenditures. Noncompliance had a minimal impact on the public in 2019, 2023 and during the 2024 Primary election when the committee was not participating in elections. The Respondent also acknowledged and took responsibility for the alleged violations and made a good-faith effort to resolve compliance, including consulting with PDC staff after the complaints were filed.

Grays Harbor Democrats completed a *Statement of Understanding* (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and .240 for failing to timely file the Post-Primary C-4 report and 21-day pre-General C-4 report for election year 2022, which collectively disclosed \$6,105.84 in General election-related expenditures after the General election. The \$300 penalty assessed resolves these allegations listed in your complaints.

Pursuant to WAC 390-37-060(1)(d), however, Grays Harbor Democrats will receive a formal written warning concerning their failure to timely disclose contributions and expenditures in years 2020-2024, and maintain financial records as required. The formal written warning will include staff's expectation that, in the future, Grays Harbor Democrats will 1) timely and accurately file all required C-3 and C-4 reports disclosing the committee's contributions and expenditures, especially during time-sensitive periods prior to elections; and 2) preserve the committee's books of account and other financial records, including its ORCA (Online Reporting of Campaign Activity) data files, for five calendar years. The Commission will consider the formal written warning letter in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is also reminding Grays Harbor Democrats about the importance of sufficiently disclosing expenditure descriptions on C-4 reports, including but not limited to, details regarding radio ads, TV ads, printed materials, the full name of candidates to whom contributions are made, and the vendors for reimbursed expenditures in accordance with PDC statutes, rules and guidance.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Grays Harbor Democrats