

05 October 2023

State of Washington
Public Disclosure Commission
711 Capital Way Rm 206
Olympia Washington 98504-0908

Attention: Kirk Young

RE: Glen Morgan Complaint, dated 19 August 2023 at 5:15 P.M.

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)”

This alleged violation lists numerous reports from 2019 to 2023. This response will make comments pertinent to each identified year.

2019: The newly elected treasurer was having trouble identifying and understanding the Public Disclosure Commission (PDC) requirements. The former treasurers were trying to help, but because of personal concerns and commitments, the treasurer resigned 8 or 9 months into the two-year term. As part of this resignation, the Kitsap County Democratic Central Committee (KCDCC) conducted an audit. The audit committee identified some errors in the submitted PDC reports. The newly appointed treasurer, with the help of the audit committee, amended the identified reports. Because of the requirements of the reporting software, amendments made to the January reports require amendments to all subsequently submitted reports. All necessary amendments were completed and submitted before KCDCC moved into 2020.

2020: The year began with KCDCC making plans for their annual fund-raising dinner with auction, and for their annual picnic at Jarstad Park. Funds were accepted for the fund-raising dinner, in addition to auction items. These funds and contributors and monthly expenses were reported to the PDC. In March 2020, all plans stopped in accordance with directives of the Washington State Governor. Because of the directives, the annual picnic was cancelled. Although the fund-raising dinner and auction was not cancelled, a large percentage of the funds received were refunded, as the contributors were not going to attend because of COVID and the Governor’s directives and requested refunds. Additionally, KCDCC requested refunds from the venue for the annual picnic. Because of these refunds, both to contributors and from the venue operator, amendments were made to as many existing reports as necessary. Reports were amended as many times as necessary based upon the timing of funding activities, e.g., refunds received, refunds returned, etc. All funding activities were reported as they became known to the treasurer.

2022: The alleged violating reports were caused by a typographical error. All amendments were made to correct the error. The error was identified by the treasurer but was not immediately located. The time lag between identifying the error and locating the error caused the “late” submittals of the reports.

2023: The alleged violating report was caused by personal commitments of our treasurer. The treasurer was attending family matters, and completed and submitted the report upon returning home.

2) “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)”

The need to identify the vendor and address of the vendor for in-kind contributions is a newly identified requirement to KCDCC. We are not sure why or how the requirement was missed but we will do our best to meet this requirement from this time forward. Thank you for identifying this requirement.

Example #1: We will go through the files for 2022 to locate the sales receipts for the donated stickers. Can we amend this 2022 report?

Examples #2, #6, & #44: Melissa Lund is a caterer and is the vendor of the items described in the identified reports. No amendments are required for these three examples.

Examples #3 & #5: We will go through the files for 2022 to locate the sales receipts for the donated items i.e., \$38.17 and \$14.83. Again, can we amend the identified 2022 report?

Example #4: J. Baxter is the designer and vendor for the identified political buttons at the value of \$83. No amendment is required.

Examples #7 - #42: All identified in-kind contributors are the vendors. These people have donated items that they have in their home, have hung on their walls, have decorated their tables, etc. Other people have donated dinners that they prepare, serve at their home, or deliver to the winning bidder’s home, i.e., they are the vendor. Again, other people have taken a ticket from their “season” tickets for the ballet, the theatre, baseball, football, etc. Yet other people are taking the winning bidder out to lunch at an agreed upon venue and time. These identified in-kind contributors are the vendors and an amendment is not required.

Example #43: We will look for the receipt in the 2019 treasurer’s file to obtain the required information. Can this 2019 report be amended?

3) Failure to accurately describe expense, and the illegal concealment of required information from the public (Violation of RCW 42.17A,240, RCW 42.17A.235 & WAC 390-16-037)

Again, we are not sure how or why we missed this requirement. We will do our best to meet this requirement from this time forward. However, this requirement seems a little like publishing a campaign plan to the public, and to the opposition.

PDC Report #110123861: We will go through the files for 2022 to locate the sales receipt from Capital City Press and get obtain the required information. Again, can we amend this 2022 report?

PDC Report #110157341: The purpose of expense should have read Sponsorship for the Kitsap Pride Festival. The sponsorship helped provide the items identified in the expense description. We will amend this 2023 report as necessary.

PDC Report #101011586: We will go through the files for 2022 to locate the sales receipts from Capital City Press and obtain the required information. Again, can we amend this 2022 report?

PDC Report #00995122: We will go through the files for 2020 to locate the sales receipt from TLS Printing and obtain the required information. Again, can we amend this 2020 report?

I wish that I could turn the clock backwards, so all these PDC reports were correct with the required information and submitted at the required time. I will share the newly identified requirements with the Committee's treasurer, so to better prepare our reports. All officers of the Kitsap County Democratic Central Committee are volunteers, and I attest to the fact that we are all doing our very best to meet the requirements of the individual positions.

Sincerely,

Johanna Baxter
Kitsap County Democratic Central Committee
Chair