

Respondent Name

Methow Aquatic Center Sponsored by Friends of the Pool PAC

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#) reported via the portal
(Thu, 24 Aug 2023 at 11:24 PM)

To whom it may concern,

It has come to my attention that the Committee for the Methow Aquatic Center Sponsored by Friends of the Pool PAC has already violated Washington State's Campaign Finance laws (**RCW 42.17A**) and they appear determined to continue to do so moving forward. The violations as detailed as follows:

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

This weird sponsored PAC decided to break the law right out of the gate from inception to now. I'm not sure why they decided this was the optimal path to achieve their political goals, but perhaps this was the legal strategy for which they paid so dearly to Pacifica Law. Regardless, the lawbreaking is serious, and I'm hoping that this complaint can serve as an early intervention before the bad legal advice they are receiving convinces them to go entirely off the transparency rails.

As always, I try to provide specific examples of lawbreaking in a very easy-to-read and simpler to understand spreadsheet format. This is both for PDC staff convenience, but it also helps the lawbreakers use the list as a reference sheet so that they can go back and try to explain, justify, or excuse their repetitive lawbreaking activities. I've attached this both as an Excel file and a PDF so that everyone involved can get the optimal value from the effort. Please note that the original report referenced in the spreadsheet can be linked by clicking on the far-right column. I believe this makes it easier for everyone.

The four primary reports they have filed so far were all substantially late – 64-35 days late – essentially never revealing in a timely manner what this shady Pac was up to.

2). Failure to report debt (Violation of RCW 42.17A.240 (9)(a))

Other than some stickers, there was essentially only one expense this PAC has reported, and weirdly enough, it was a \$5,000 payment to Pacifica Law (See **PDC Report # 110166731, attached for staff reference**) for approximately 12 hours of legal advice, which presumably directed this Pac to file their reports late, which certainly sounds like Pacifica Law's legal team to me.

Regardless of the quality and bad advice from the Pacifica Law Firm, this should have been reported as a debt on the earlier C4 – assuming one of them was filed sometime within a few months of when it was originally due.

This is just one of those shady, weird PACs whose expenses appear wasteful (nothing illegal with that), and who can't seem to follow the law regardless of the fact that all their expenditures is on legal costs. It just seems like they should explain their lawbreaking, fix their failure to report a debt and maybe try to do some soul searching for why they can't get it right.

Let me know if you need anything more on this one.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?
The public has a right to know why a local MEGA PAC (for local issues - this is a very large operation) is concealing the expenditures from the public and maybe why they spent all their cash on 12 hours of attorney fees? Why didn't they report the debt?
List of attached evidence or contact information where evidence may be found
Easy to sort out this one - relatively few reports.
List of potential witnesses with contact information to reach them
Everyone on this PAC board, and the Sponsor Board
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4

Committee for the Methow Aquatic Center Sponsored by Friends of the Pool (Committee for MAC Sponsored by FOP)
Committee for the Methow Aquatic Center Sponsored by Friends of the Pool -
PO Box 438
Twisp, WA 98856

Coverage: 06/01/2023 to 07/31/2023
Final report: No
Report number: 110166731
Reporting year: 2023
Date submitted: 08/15/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$10,000.00
2. Cash received (Schedule A line 1).	\$100.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$100.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$10,100.00
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$142.31
11. Cash expenditures (Line 3 schedule A).	\$5,600.49	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$5,600.49
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$5,742.80

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$4,357.20
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$4,357.20

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Jessica Kuzma - 08/15/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
06/20/2023	\$100.00				

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$100.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$115.69
06/06/2023	Pacifica Law Group Dept. 701, PO Box 509017 , San Diego, CA 92150	Accounting, legal, regulatory compliance, etc.: Expenses include phone conversation, emails with law group to advise on formation of rec district and drafting of materials. Total hours = 11.9		\$5,000.00
06/23/2023	Sticker Mule 336 Forest Ave , Amsterdam, NY 12010	Campaign merchandise/paraphernalia: stickers: 1000 stickers @ \$131/250, + sales tax/shipping		\$484.80
			\$0.00	\$5,600.49

4. TOTAL EXPENDITURES: \$5,600.49

Report notes/attachments

Under expenditures, the undefined expenses is a printing charge to FedEx for a banner advertising our campaign 6ft x 2ft, cost includes tax .

Committee fro the Methow Aquatic Center - Weirdly sponsored by the Friends of the Pool - Illegally late repots already

Report #	Type	Amends	Deposit		Projected		Date	Submitted	Projected	Est. Total	Filer	Hyperlink
			Date	From	Through	Due Date	Days Late					
110166735	C4	Original				6/12/2023	8/15/2023	64	\$142.31	MAC Sponsored by FOP)	Committee for the Methow Aquatic Center Sponsored by Friends of the Pool (Committee for	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166735
110166731	C4	Original				7/11/2023	8/15/2023	35	\$5,600.49	MAC Sponsored by FOP)	Committee for the Methow Aquatic Center Sponsored by Friends of the Pool (Committee for	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166731
110166726	C3	Original	6/20/2023			6/26/2023	8/15/2023	50	\$100.00	MAC Sponsored by FOP)	Committee for the Methow Aquatic Center Sponsored by Friends of the Pool (Committee for	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166726
110166722	C3	Original	5/12/2023			6/12/2023	8/15/2023	64	\$10,000.00	MAC Sponsored by FOP)	Committee for the Methow Aquatic Center Sponsored by Friends of the Pool (Committee for	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166722

Committee fro the Methow Aquatic Center - Weirdly sp

Report #	Type	Amends	Deposit Date	From	Through	Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity
110166735	C4	Original				6/12/2023	8/15/2023	64	\$142.31
110166731	C4	Original				7/11/2023	8/15/2023	35	\$5,600.49
110166726	C3	Original	6/20/2023			6/26/2023	8/15/2023	50	\$100.00
110166722	C3	Original	5/12/2023			6/12/2023	8/15/2023	64	\$10,000.00

onsored by the Friends of th

Filer

Committee for the Methow Aquatic Center

Sponsored by Friends of the Pool (Committee for
MAC Sponsored by FOP)

Committee for the Methow Aquatic Center

Sponsored by Friends of the Pool (Committee for
MAC Sponsored by FOP)

Committee for the Methow Aquatic Center

Sponsored by Friends of the Pool (Committee for
MAC Sponsored by FOP)

Committee for the Methow Aquatic Center

Sponsored by Friends of the Pool (Committee for
MAC Sponsored by FOP)

e Pool - Illegally late repots already

Hyperlink

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166735>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166731>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166726>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110166722>