



**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

November 20, 2023

Delivered electronically to Lake Washington Schools Levy Committee at
lakewalevy19@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Case 141700

Dear Trevor Willett:

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

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, per WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to follow filing requirements for RCW 42.17A.235, .240 and WAC 390-16-037 in election years 2019 through 2022 as noted in the enclosed letter sent to Mr. Morgan. Staff expects you to file all required reports of contributions and expenditures in future years timely and accurately. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

If you have questions, you may contact Tanya Mercier toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavallee
Executive Director



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November 20, 2023

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint against Lake Washington Schools Levy Committee, PDC Case 141700

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on August 24, 2023. The complaint alleged that the Lake Washington Schools Levy Committee (the Committee), a political action committee, may have violated RCW 42.17A.235, .240 and WAC 390-16-037 for failure to timely and accurately disclose contributions and expenditures on reports and failure to provide detailed purpose of campaign expenditures in election years 2019 through 2023.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by 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.

Based on staff's review, we found the following:

- The Respondent, previously identified as Lake Washington Citizens Levy Committee, last filed a Political Committee Registration (C-1pc) report on April 07, 2023. The Committee is a continuing committee and has selected the Full Reporting option. Per the Chair, the Committee participated in elections on April 23, 2019, and February 8, 2022.
- Per RCW 42.17A.235 and .240, under the Full Reporting Option, the Committee was required to disclose contribution and expenditure information by submitting Receipts and Expenditure Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3) reports to the PDC. The Committee's due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.
- Amendments are insufficient evidence of late reporting. There are many reasons a committee might amend their reports, and the mere presence of an amendment is not itself conclusive evidence of a violation. When considering C-3 and C-4s, these report

amendments require inspection of the actual report to figure out whether the committee has a requirement to report activity by a given date. As well, deciding if a report is late is not as simple as calculating the days late based on a periodic reporting timeline and when a report was filed but is fact specific to the campaign and its activities. In this instance, the evidence provided was insufficient to support the allegations of late or inaccurate reporting for the identified amended reports for 2023.

- Of the non-amended reports due in 2019, 2020, 2021 and 2022, outlined in the evidence provided, there were eight C-3 reports and four C-4 reports filed significantly late during these reporting years. In their response to the complaint, the Committee acknowledged the reports were filed late due to medical issues experienced by the volunteer treasurer. The Committee has since hired a professional treasurer and reports filed in 2023 have been submitted timely and appear accurate.
- Per WAC 390-16-037(2), expenditures pursuant to an agreement or understanding must describe in detail the goods and/or services provided.
- The complaint identified six reports alleged to be missing detailed description of purpose for reported expenditures. Based on staff's review of the reports the reporting was insufficient in detail as outlined in WAC 390-16-037(2). The campaign did provide a general description of the expenditures and based on the information reported, the public was not deprived of critical information at the time of the election. Due to character limitations in ORCA, at the time of reporting, detail as outlined in the WAC would not have been feasible. Therefore, PDC staff has determined that requiring the campaign to amend reports now, for the 2019 election, does not serve the purpose of providing useful or timely information to the public. PDC staff did request the Committee amend the one report in the 2022 campaign, C-4 #110124675, and the Committee has complied with that request.
- The Committee does not have similar warnings or violations of PDC requirements.

Based on our findings staff has determined that, in this instance, Lake Washington Schools Levy Committee's failure to timely and accurately disclose contributions and expenditures on reports in election years 2019 through 2022 and provide detailed descriptions for expenditures does not amount to a finding of a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, Lake Washington Schools Levy Committee will receive a formal written warning concerning their failure to follow filing requirements for RCW 42.17A.235, .240 and WAC 390-16-037 when reporting in the 2019 through 2022 election years. Staff expects the Committee to file all required reports of contributions and expenditures in future years timely and accurately. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavallee
Executive Director

cc: Lake Washington Schools Levy Committee