



**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.pdcc.wa.gov

December 5, 2023

Delivered electronically to IAFF Local 2781 PAC at "treasurer@snocountyffunnion.com"

Subject: Complaint filed by Glen Morgan, PDC Case 141813

Dear IAFF Local 2781 PAC:

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 in accordance with 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, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning IAFF Local 2781 PAC's failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. Staff expects you to timely and accurately file all required reports of contributions and expenditures including accurate carry forward balances and the inclusion of all required contact information on C-4 reports in future 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.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director



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December 5, 2023

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding IAFF Local 2781 PAC, PDC Case 141813

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 26, 2023. The complaint alleged that IAFF Local 2781 PAC, a political committee registered with the PDC, may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for calendar years 2018 to 2023, disclosing contributions and expenditures, including an incorrect carry forward balance, and missing address information for contribution recipients.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by legal counsel, Derek Schoonmaker, on behalf of the Respondent; the applicable PDC reports filed by the Respondent; queried the Respondent's data in the PDC contribution and expenditure database; 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:

- During calendar years 2018, 2019, 2020, 2021, 2022 & 2023 IAFF Local 2781 PAC (IAFF) was registered with the PDC as a continuing political action committee under the "Full Reporting" option, and most recently listed Craig Fisher as Manager and Brandon Mauer as Treasurer.

Failure to timely file C-3 reports and C-4 reports

- The complaint alleged that IAFF failed to timely file various C-3 and C-4 reports covering campaign activity for calendar years 2018 to 2023. The evidence of the late reporting was submitted in the form of a spreadsheet where the projected due date was assumed solely based on the reporting schedule for committees registered under the "Full Reporting" option, participating in elections during the calendar year, and without consideration of the dollar amount disclosed on each report.
- In addition, the spreadsheet alleged that six amended reports were submitted late but did not provide any specific information about the activity that purportedly was omitted from the original or otherwise edited.
- During the review of the alleged late reporting spreadsheet, PDC staff found that many disclosed small dollar amounts under the reporting threshold (more than \$750 as of April

1, 2023, and more than \$200 in prior years) for monthly C-4 reports, or were amendments as discussed above.

- After receipt of the complaint, IAFF submitted forty-two original or amended C-3 reports and forty-nine original or amended C-4 reports. One C-4 report was submitted late but before the complaint.
- In his response, Mr. Schoonmaker stated that the committee acknowledges the late reporting and missing information, explaining that this was a significant oversight by the former treasurer but there was no intentional effort to conceal information from the public. He further stated that IAFF realized its errors and had already begun the process of filing the missing reports prior to the complaint.
- Staff noted that IAFF had filed missing C-3 and C-4 reports covering activity from 2018 into mid-2020 with help from the PDC Filer Assistance staff and continued until the reporting was up to date.

Inaccurate carry forward balance

- The complaint alleged that the IAFF failed to disclose an accurate carry forward amount on C-4 reports from 2019 to 2020.
- During the investigation, staff found that the C-4 report covering December 1 to 31, 2019, showed a cash on hand balance of \$8,316.75 and the subsequent C-4 report covering January 1 to 31, 2020, began with \$7,802.25 beginning balance.
- In his response, Mr. Schoonmaker stated that the discrepancy in the carry forward was a result of the committee's efforts to correct previous reporting errors. He explained that the committee encountered an incorrect automatic balance calculation thought to be caused by the transition between old and new version of the PDC's ORCA (Online Reporting of Campaign Activity) software. Mr. Schoonmaker confirmed that the carry forward errors have now been corrected.

Missing address information for contribution recipients

- The complaint alleged that the IAFF failed to disclose the addresses for all recipients of contributions given.
- During the investigation, staff found that although the names were accurately disclosed, a small number of C-4 reports originally failed to include the required address for contribution recipients.
- In his response, Mr. Schoonmaker stated that in a few instances, the committee was unable to readily identify the address information for contribution recipients for prior years and that it opted to file the reports without this detail until the information was available. He confirmed that the committee has since obtained the missing addresses and amended reports have been submitted.
- During a review of IAFF's new and amended C-4 reports, staff found that IAFF is in substantial compliance regarding the requirement for disclosing the address of contribution recipients.

It appears that the late reporting was due to the oversight of the former volunteer treasurer and not done intentionally to conceal the PAC's activities from the public. Staff noted that the Respondent began the work of completing all missing campaign reports prior to the receipt of the

complaint. The Respondent worked with PDC Filer Assistance staff to complete reports disclosing campaign activity as required under the “Full Reporting” option, including activity from 2018, most of which is beyond the statute of limitations for enforcement action. Staff found no evidence that the Respondent purposely filed late or inaccurate reports to mislead or otherwise keep information from the public.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file campaign reports for calendar year 2018 forward, including an incorrect carry forward and missing address information for contribution recipients resulting in necessary amendments, does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, the Respondent will receive a formal written warning concerning failure to timely and accurate disclosure of all contribution and expenditures. The formal written warning will include staff’s expectation that IAFF Local 2781 PAC timely files all future required reports of contributions and expenditures, including accurate carry forward balances and the inclusion of all required contact information on C-4 reports. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director

cc: IAFF Local 2781 PAC