

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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

November 20, 2023

Delivered electronically to Green Party of Washington State at "margaretelisabeth@outlook.com"

Subject: Complaint filed by Glen Morgan, PDC Case 141972

Dear Green Party of Washington State:

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 the Green Party of Washington State'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 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 pdc@pdc.wa.gov.

| Sincerely, | Endorsed by, |
|-----------------------|-----------------------|
| Electronically signed | Electronically signed |
| Jennifer Hansen | Peter Frey Lavallee |
| Compliance Officer | Executive Director |



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November 20, 2023

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

Subject: Complaint regarding Green Party of Washington State, PDC Case 141972

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 21, 2023. The complaint alleged that the Green Party of Washington State, a minor party committee registered with the PDC during calendar years 2019, 2022 & 2023, may have violated RCW 42.17A.235 & .240 for failure to timely file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports).

PDC staff reviewed the allegations and supporting documentation; the applicable statutes, rules, and reporting requirements; the response provided by Treasurer Lisa Canar, on behalf of the Respondent; the applicable PDC reports filed by the Respondent; and 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 2019, 2022 & 2023 the Green Party of Washington State was registered as a minor party committee with the PDC under the "Full Reporting" option, and most recently listed Lisa Canar as Treasurer.
- The complaint alleged that the Green Party of Washington State filed numerous C-3 and C-4 reports covering campaign activity for calendar years 2019, 2022 and 2023, late. 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 participating in elections during the calendar year and without consideration of the dollar amount disclosed on each report.
- In addition, the spreadsheet alleged that five 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 the 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.
- Staff did note reports that appeared to be submitted after the filing deadline, including C-4 reports showing expenditures for party fundraising events, utilities, and overhead costs. Staff also found a number of C-3 reports covering activity in 2019 that were filed late, the

- most glaring examples of which were from the first half of the calendar year, with C-3s submitted several months beyond the required due date.
- In the response, Ms. Canar acknowledged the late filing, citing the impact of switching reporting options from "Mini Reporting" to "Full Reporting" in May 2022, and noting that all original C-4 reports have been submitted timely since.
- Ms. Canar's response included a list of nineteen C-3 reports covering 2022 and 2023 that were filed between one and twenty-two days late.
- Finally, Ms. Canar apologized for the late filings and committed to be timely in the future, including timely amendments.

It appears that although the Green Party of Washington State did submit campaign reports late ranging from calendar year 2019, 2022 and 2023, many of the expenses were for party building activities, utilities and overhead. The majority of the late reported contributions made by the Respondent were filed in previous calendar years or at least before the 2023 general election.

Staff found no evidence that the Green Party of Washington State purposely filed late or inaccurate campaign reports in order to conceal its activities from the public or adversely affect the outcome of previous elections.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file campaign reports dating back from calendar year 2019, 2022 and 2023, 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 accurately file reports disclosing campaign activity. The formal written warning will include staff's expectation that the Green Party of Washington State timely and accurately files all future required reports of contributions and expenditures. 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 all allegations in 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 pdc@pdc.wa.gov.

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cc: Green Party of Washington State