



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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November 21, 2023

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Mead Citizens Advisory Committee, PDC Case 142044

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 30, 2023. The complaint alleged that Mead Citizens Advisory Committee, a continuing political action committee registered with the PDC, may have violated RCW 42.17A.235 & .240 for failure to accurately and timely disclose contribution and expenditure reports, including failure to properly breakdown/fully describe the purpose of committee expenditures/details on Summary, Full Report Receipts and Expenditures (C-4) reports, as required in WAC 390-16-037, during election years 2018 – 2021.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules; the September 22, 2023, response provided by Jolene Andres, Interim Treasurer, on behalf of the Committee; the applicable PDC reports filed by Mead Citizens Advisory Committee (Committee); 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 election years 2018, 2019 and 2021, the Committee was registered with the PDC under the "Full Reporting" option for the 2018 February Special election, 2019 General election and 2021 February Special election, respectively.
- You alleged that the Committee failed to timely and accurately report contributions (C-3) and expenditure (C-4) reports during election years 2018 – 2021. Additionally, you also alleged that the Committee failed to properly breakdown/fully describe the purpose of expenditures undertaken by the Committee. You included an Excel spreadsheet depicting alleged late reports for election years 2018 – 2021. You also included/attached copies of C-4 reports showing expenditures that lacked alleged proper description or breakdown of expenditures.
- Staff reviewed the attachments you submitted with the complaint and noted that there were some expenditures made by the Committee either to vendors or as an in-kind contribution for which a more detailed description/purpose should have been provided, such as the number/quantity of items, name and address of the vendors and other required items on the Schedule B to the C-4 report. For example, the Committee failed to include sufficient/proper expenditure descriptions for the "Mailing Services"

expenditures undertaken by the Committee on September 20 and September 30, 2019, for \$11,805.28 and \$4,395.31, respectively.

- In its response to the complaint, the Committee, by way of Jolene Andres, stated: “We acknowledge the committee, comprised of community volunteers, has been complaisant in meeting filing requirements and deadlines. Committee reports have been filed late and contributions and expenditures have at times, not been reported. While not intended to excuse poor compliance, the committee has experienced a couple of recent turnovers in treasurer with one individual filling the role for the 2018 and 2019 campaigns, followed by a new person in 2021.”
- On October 16 and 18, 2023, the Committee amended multiple reports for 2019 and 2021, to better depict and correct the issues raised in your complaint, noting in an email to staff on October 19, 2023, that “As requested, Mead Citizens Advisory Committee PDC reports have been updated in the PDC online system for the 2019 and 2021 campaigns. You will note the 2019 Campaign starts on 7/23/19 with an ending balance of \$53,470.08. That campaign ends on 12/31/19 with an ending balance of \$17,074.69. That balance was carried over on 1/1/20 to the 2021 Campaign. The last report included for 2021 is for 9/1/23 – 9/30/23. The cash balance on 9/30/23 is \$31,587.23. As documentation of that cash balance you will also find included in the 2021 information a copy of the STCU bank statement for 9/1/23 – 9/30/23 that shows an ending balance of \$31,587.23.”

Based on these findings, staff has determined that, in this instance, the Committee’s failure to timely and accurately file C-3 and C-4 reports, including failure to properly and accurately describe the purpose of the expenditures to include the number/quantity of items bought, does not amount to a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), the Committee will receive a formal written warning concerning its failure to timely/accurately disclose C-3/C-4 reports and properly breakdown/describe the purpose of expenditures on C-4 reports in the 2019 – 2021 election years. The Committee will be informed the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules.

Accordingly, 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 Erick Agina, Compliance Officer at 360.586.2869, toll-free at 1-877-601-2828, or by email at pdcc@pdc.wa.gov

Sincerely,

Endorsed by:

s/ _____

s/ _____

Erick O. Agina, Compliance Officer

Peter Frey Lavallee, Executive Director

cc: Mead Citizens Advisory Committee