



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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(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 11, 2023

Delivered electronically to Skamania County Democrats at “skamaniademocrats@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 142409

Dear Skamania County Democrats:

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 Skamania County Democrats’ 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 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,

Endorsed by,

Electronically signed

Jennifer Hansen
Compliance Officer

Electronically signed

Peter Frey Lavalley
Executive Director



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December 11, 2023

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding Skamania County Democrats, PDC Case 14209

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 8, 2023. The complaint alleged that Skamania County Democrats, a bona fide county party committee, may have violated: (1) RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign; and (2) RCW 42.17A.235 & .240 for failure to disclose an accurate carry forward balance.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Treasurer Grace D. Cross and former Treasurer and Committee Chair, Honna Sheffield, on behalf of the Respondent; the applicable PDC reports filed by the Respondent; 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 2020, 2021, 2022 & 2023 Skamania County Democrats was registered as a bona fide county party committee with the PDC under the “Full Reporting” option, and most recently listed Grace Cross as Treasurer, Jamie Tolfree as Secretary, and Bob Hamlin as Chair.
- The complaint alleged that the Skamania County Democrats filed numerous C-3 and C-4 reports, covering campaign activity for calendar years 2020 to 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.
- 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.
- Staff did note reports that appeared to be submitted after the filing deadline, including C-4 reports showing expenditures for party fundraising events and other party building activity unrelated to any candidate election.

- In addition, staff found that during calendar years 2020 and 2022, Skamania County Democrats made several contributions to candidate which were reported timely.
- The complaint also alleged that Skamania County Democrats had an incorrect carry forward amount balance on C-4 reports.
- In her response, Ms. Sheffield explained that she took over in 2021 after learning that the former treasurer had failed to file campaign reports in a timely manner. She stated that the discrepancy in the carry forward amount, from calendar year 2020 to 2021, was reviewed with the help of PDC Filer Assistance staff and, after significant research, ultimately adjusted by the Respondent to match the campaign bank balance. In addition, she stated that she utilized the dropdown menu options in ORCA (Online Reporting of Campaign Activity) when entering expenditure descriptions but did not add detail as she was not aware of the requirements at the time.
- Skamania County Democrats has no prior enforcement history.

It appears that although the Skamania County Democrats did submit a small number of campaign reports late ranging from calendar year 2020 forward, many of the expenses were for party building activities, and items not related to any candidate elections. Staff noted that the carry forward balance discrepancies have been addressed.

Staff found no evidence that the Skamania County Democrats 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 2020 forward, including details of in-kind contribution activities, 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 disclosure of all contributions and expenditures. The formal written warning will include staff's expectation that Skamania County Democrats timely and accurately file all required reports of contributions and expenditures including accurate carry forward balances on C-4 reports in future years. 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: Skamania County Democrats