

Respondent Name

39th District Democratic Party Organization

Complainant Name

Glenn Morgan

Complaint Description**Glen Morgan**

reported via the portal

(Mon, 26 Feb 2024 at 3:05 PM)

To whom it may concern,

It has come to my attention that the 39th Legislative District Democrats, once again, has violation Washington State's campaign finance laws (**RCW 42.17A**). The details of these violations are as follows:

Illegally exceeding contribution limits for mini-reporting. Failing to convert to full reporting political committee. Concealing this information from the public (Violation of RCW 42.17A.205, RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-105, WAC 390-16-115, WAC 390-16-125)

On at least one occasion, this secretive dark money party PAC accepted a contribution far in excess of the contribution limit from one donor to a mini-reporting campaign (**See WAC 390-16-105(1)(b))**.

Specifically, this campaign received a \$2000 contribution from the Washington State Democrats on 8/23/2023 (See PDC Report # 110172389, attached for staff reference).

There is no evidence of this campaign refunding money to this PAC, nor is there any evidence of this campaign changing filing status from mini-reporting to full reporting (**See WAC 390-16-125** for that process). Just to confirm, I have attached the C-1 which was updated a few days after they received this \$2,000 from the Washington State Democrats.

Please note, this local bona fide Party PAC also has an exempt account, which also converted from mini-reporting to full reporting around the same time, but they didn't report this cash infusion either. I've attached this exempt account C-1 as well for reference.

It appears likely that if this secretive PAC was willing to so openly violate the mini-reporting requirements laid out by the Washington State Campaign Finance laws, there are probably more laws they broke as well, but I'll share those details when I have them sorted out.

Please note, **this is a crew with a history of violating Washington States campaign finance laws. See PDC Enforcement Case #26307, which I've attached for staff reference.** This was based on a solid complaint I filed at the time in 2017, and the same players are involved. **Back**

then, they were forced to forfeit illegally obtained funds to the state and they were not fined. This time, I hope the PDC considers more stringent penalties this time around.

For now, this should be enough to investigate this crew of lawbreakers.

Let me know if you need anything else.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to know what shady, secretive Dark Money party PACs like this one are really doing with their cash. Why are they concealing the truth from the public. They've been caught breaking the law in the past. Why are they still breaking the law now? So many questions the public has that need to be answered by this crew.

List of attached evidence or contact information where evidence may be found

All referenced in the body of the complaint and exhibits attached for staff reference.

List of potential witnesses

All people associated with this shady crew should be interviewed and their bank accounts subpoenaed for verification that anything they have reported is even close to the truth.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



39th District Democratic Party Organization - Exempt

15425 245th Ave SE
Monroe, WA 98272
39lddo@gmail.com
4253197330

Registration Filed

Bonafide District Exempt
Democratic Party
Full Reporting
Mini-to-Full Permission Granted
Submitted date: 08/27/2023
Certified by eric@northshoretaxaccounting.com
Continuing
39THLD3252

Bank Information

Becu
18333 Bothell Way NE
Bothell, WA 98011
To schedule books review contact eric@northshoretaxaccounting.com

Officers

Eric Halvorson

Ministerial Treasurer
15425 245th Ave SE
Monroe, WA 98272
eric@northshoretaxaccounting.com
206-890-0795

Jessica Wadhams

Chair
15425 245th Ave SE
Monroe, WA 98272
39lddo@gmail.com
4253197330

message.ticket.for

Democratic

Attachments

Name	Description
39th Approval.pdf	
39th Exec.pdf	

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Sat, 30 Sep at 11:42 PM) via Portal [Meta](#)

To Whom it May Concern --

It has come to my attention that the 39th Legislative District Democrats have habitually and willfully committed frequent and multiple violations of RCW 42.17A.

1) Failure to file campaign finance reports electronically. (Violation of RCW 42.17A.245, see WAC 390-19-050(2))

State law requires that committees (who expend \$5000 or more in the previous year or **expect to in the current year**) file their C3 contribution and C4 expenditure reports electronically, using either ORCA, or an alternative reporting software. As such, the 39th District Democrats were required to file electronically.

The 39th District Democrats did not lack the technological ability to file reports using the electronic means provided by the PDC. In fact, in years prior, the Committee did file electronic reports.

RCW 42.17A.245(2) also clearly states: "failure by a candidate or political committee to comply with this section is a violation of this chapter."

It should be clear why the state legislature voted to make this a violation. The Public Disclosure Commission is an agency of limited staff and resources. Allowing committees to file using non-electronic means (even though they possess the capability to use electronic alternatives), creates an even larger burden on PDC staff -- who must scan and proof the documents that are sent to them.

As a result of this illegal method of filing, individuals who seek to view a list of the Committee's donors were greeted with a blank page when searching the PDC's normal database.

The committee must immediately electronically file reports during the period that they illegally failed to do so.

2) State law requires that candidates and committees file regular, accurate, timely C3 and C4 reports. RCW 42.17A.235.

Unfortunately, the 39th District Democrats filed numerous reports well past the appropriate due dates in both 2015, 2016, and 2017. One report appears to have been filed more than a year late. As mentioned before, these reporters were also not filed digitally.

The majority of these late reports lack report #s because they were not filed digitally.

3) State law prohibits committees from accepting more than \$300 worth of anonymous contributions annually, or 1% of the total amount raised, whichever is greater. RCW 42.17A.220 (4). State law also establishes that candidates must return contributions that exceed the contribution limits contained in RCW 42.17A.405 within 10 days of receipt. RCW 42.17A.405, RCW 42.17A.110, WAC 390-16-312.

In 2014, the Committee reported having received \$1639 in anonymous contributions. *(See attachments)* This amount is illegally in excess of the applicable \$300 anonymous contribution limit.

\$1339 was collected illegally by the Committee when it should have been sent to the State Treasurer's Office.

In 2015, the Committee reported having received \$384.00 in anonymous contributions. (See *attachments*) This amount is illegally in excess of the applicable \$300 anonymous contribution limit.

\$84.00 was collected illegally by the Committee when it should have been sent to the State Treasurer's Office.

In 2016, the Committee reported having received \$990.00 in anonymous contributions. (See *attachments*) This amount is illegally in excess of the applicable \$300 anonymous contribution limit.

\$690 was collected illegally by the Committee when it should have been sent to the State Treasurer's Office.

In total, \$2113 must be immediately transmitted to the State Treasurer's Office for deposit into the general fund per RCW 42.17A.220 (4). The Committee has illegally refused to transmit these funds for far longer than 10 days of receipt.

3) State law requires that the committee treasurer preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred. (Violation of RCW 42.17A.235 (6)). State law further requires that the committee treasurer maintain a list of all individuals contribution no more than twenty-five dollars in the aggregate from any one person during the election campaign. RCW 42.17A.240(2)(c).

On information and belief, the 39th District Democrats have failed to maintain financial records for a period of five calendar years following the year during which the transaction occurred. Specifically, I believe that they have failed to maintain a list of individuals contributing no more than twenty-five dollars in the aggregate from any one person, as specifically required by state law.

Best Regards,

Glen Morgan

CASH RECEIPTS
MONETARY
CONTRIBUTIONS

C3

(1/12)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

AUG 08 2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

39th Legislative District Democratic Party Organizat

Mailing Address

PO Box 1686

City

Duvall

Zip + 4

98019-1686

Office Sought (candidates)

Election Date

11/8/2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
12/31/15	a. Anonymous <i>No DETAILED RECORDS EXIST</i>	\$ 384.80	\$ 384.80
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L.....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation.....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
					\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Sub-total			384.80	
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0	

*See reverse for details.

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

384.80

4. Date of Deposit

12/31/2015

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Treasurer's Daytime Telephone No.: (360) 794 - 0430

Charles A. Bean

7/30/2016

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/12)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

AUG 08 2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

39th Legislative District Democratic Party Organizat

Mailing Address

PO Box 1686

City

Duvall, WA

Zip + 4

98019-1686

Office Sought (candidates)

Election Date

11/8/2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
3/28/16	a. Anonymous.....	\$ 535.92	\$ 535.92
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L.....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation.....		
4/17/16	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>3</u> (persons)	60.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
4/17/2016	Alan Brennan Unknown				\$150.00	\$
	Occupation					
					\$	\$
	Occupation					
4/17/2016	Mark & Diane Studley 3309 Erika Ln. Mount Vernon, WA 98273				\$50.00	\$50.00
	Occupation					
4/17/2016	Skagit Cnty. Democrats 1418 Railroad Ave Sedro Wooley, WA 98284				\$160.16	\$160.16
	Occupation					
					\$	\$
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			946.08	
		Amount from attached pages				

*See reverse for details.

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

946.08

4. Date of Deposit

4/20/2016

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Chen C Bean

7/30/2016

Treasurer's Daytime Telephone No.: (360) 794 - 430

C3

(1/12)

AUG 08 2016

11/8/2016

Treasurer's Daytime Telephone No.: (360) 794 - 430

7/31/16

CASH RECEIPTS
MONETARY
CONTRIBUTIONS

C3

(1/12)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

AUG 08 2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

39th Legislative District Democratic Party Organizaat

Mailing Address

PO Box 1686

City

Zip + 4

Office Sought (candidates)

Election Date

Duvall, WA

98019-1686

11/8/2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
3/25/16	a. Anonymous.....	\$ 356.00	\$ 356.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L.....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation.....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
					\$	\$
		Occupation				
					\$	\$
		Occupation				
					\$	\$
		Occupation				
					\$	\$
		Occupation				
					\$	\$
		Occupation				
					\$	\$
		Sub-total			356.00	
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Amount from attached pages				*See reverse for

***See reverse for details.**

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit

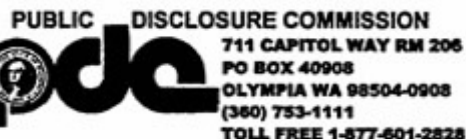
I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date _____

Treasurer's Daytime Telephone No.: (360) 794 - 0430

7/30/2016



C3

(1/12)

THIS SPACE FOR OFFICE USE

DATE FILED PCC

AUG 08 2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

39th Legislative District Democratic Party Organizaat**Mailing Address**

PO Box 1686

City

Zip + 4

Office Sought (candidates)

Election Date

Duvall, WA

98019-1686

11/8/2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
12/31/14	a. Anonymous <i>No DETAILED RECORDS EXIST</i>	\$ 1,639.00	\$ 1,639.83
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
					\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Sub-total			1,639.83	
		Amount from attached pages				

*See reverse for details

***See reverse for details.**

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date _____

12/31/2014

Treasurer's Daytime Telephone No.: (360) 794 - 0430

7/10/2016



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Washington State Democratic Committee - NonExempt

615 2nd Ave Suite 580
Seattle, WA

Coverage: 07/25/2023 to 08/31/2023

Final report: No

Report number: 110172389

Reporting year: 2023

Date submitted: 09/11/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$1,536,038.33
2. Cash received (Schedule A line 1).	\$132,025.00	
3. In-kind contributions received (Line 1 schedule B).	\$21,566.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$153,591.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$1,689,629.33
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$31,911.10
11. Cash expenditures (Line 3 schedule A).	\$46,378.01	
12. In-kind expenditures (Line 1 schedule B).	\$21,566.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$67,944.01
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$99,855.11

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$1,589,774.22
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$1,589,774.22

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

David Kim - 09/11/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
07/27/2023	\$25.00	08/09/2023	\$30.00	08/24/2023	\$35.00
07/27/2023	\$30.00	08/10/2023	\$5,000.00	08/25/2023	\$100,000.00
08/02/2023	\$20,000.00	08/15/2023	\$20.00	08/28/2023	\$20.00
08/03/2023	\$110.00	08/17/2023	\$20.00	08/28/2023	\$4,000.00
08/03/2023	\$10.00	08/17/2023	\$100.00	08/29/2023	\$25.00
08/07/2023	\$2,500.00	08/23/2023	\$100.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$132,025.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$30.32
08/02/2023	Paragon 3901 Centerview Dr Ste W , Chantilly, VA 20151-3229	G Bank Fees	\$27.50
08/23/2023	10th District Democrats PO Box 1473 , Stanwood, WA 98292-1473	C Contribution	\$2,000.00
08/23/2023	11th District Democrats 17917 162nd Pl SE , Renton, WA 98058-9166	C Contribution	\$500.00
08/23/2023	18th Legislative District Democrats 2125 Seaview St West 2125 Ave W , University Place, WA 98466	C Contribution	\$2,000.00
08/23/2023	19th LD Democrats PO Box 823 , Montesano, WA 98563-0823	C Contribution	\$500.00
08/23/2023	23rd Legislative District Democrats 7245 Cornell Ct Northwest 7245 Ct NW , Bremerton, WA 98311	C Contribution	\$2,000.00
08/23/2023	27th District Democrats PO Box 1532 , Tacoma, WA 98401-1532	C Contribution	\$4,000.00
08/23/2023	31st Legislative District Democrats PO Box 161 , Sumner, WA 98390-0030	C Contribution	\$564.00
08/23/2023	33rd District Democratic Organization PO Box 90608 , Bellevue, WA 98009	C Contribution	\$2,000.00
08/23/2023	39th LD Democratic Party Organization 4405 95th Northeast 4405 - St NE , Marysville, WA 98270	C Contribution	\$2,000.00
08/23/2023	40th LD Democrats 422 N Barker St , Mount Vernon, WA 98273-3118	C Contribution	\$450.00
08/23/2023	49th Legislative District Democrats 7010 NE 56th St , Vancouver, WA 98661-3639	C Contribution	\$2,000.00
08/23/2023	Clallam County Democratic Central Committee PO Box 2454 , Port Angeles, WA 98362-0314	C Contribution	\$2,000.00
			\$46,378.01

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
08/23/2023	Cowlitz County Democratic Central Committee 536 Oregon Way , Longview, WA 98632-1536	C Contribution	\$1,955.00
08/23/2023	Grays Harbor Democratic Committee PO Box 1423 , Aberdeen, WA 98520-0299	C Contribution	\$500.00
08/23/2023	Jefferson County Democrats PO Box 85 , Port Townsend, WA 98368-0085	C Contribution	\$1,300.00
08/23/2023	Kittitas County Democratic Central Committee 1106 E 3rd Ave , Ellensburg, WA 98926-3525	C Contribution	\$1,991.19
08/23/2023	Klickitat County Democratic Central Committee PO Box 154 , Lyle, WA 98635-0004	C Contribution	\$500.00
08/23/2023	Mason County Democratic Central Committee PO Box 1272 , Shelton, WA 98584-0952	C Contribution	\$2,000.00
08/23/2023	NCW Democrats 1 S Chelan Ave Bsmt STE , Wenatchee, WA 98801-2202	C Contribution	\$1,060.00
08/23/2023	Skagit County Democratic Party 1919 Tweed Pl , Anacortes, WA 98221-3132	C Contribution	\$2,000.00
08/23/2023	Snohomish County Democrats 2720 Rucker Ave Ste 101 , Everett, WA 98201-3464	C Contribution	\$2,000.00
08/23/2023	Spokane County Democratic Central Committee 321 S Cedar St , Spokane, WA 99201-7029	C Contribution	\$5,000.00
08/23/2023	Walla Walla Democratic Central Committee PO Box 1323 , Walla Walla, WA 99362-0024	C Contribution	\$2,000.00
08/23/2023	Whatcom County Democrats PO Box 3095 , Bellingham, WA 98227-3095	C Contribution	\$4,000.00
08/23/2023	Yakima Democratic Club 1607 S 1st Ave , Yakima, WA 98902-6005	C Contribution	\$2,000.00

\$46,378.01

4. TOTAL EXPENDITURES:

\$46,378.01

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
08/16/2023	Empowering Resources LLC 24 A Trolley Sq # 1223 , Wilmington, DE 19806-3334		Training Fees	Fair market value: \$3,216.00 Aggregate total (N): \$3,216.00
07/31/2023	Eric Schmidt 1600 Amphitheatre Pkwy , Mountain View, CA 94043- 1351	CEO, Hillspire LLC Mountain View, CA	Stac Labs, Inc - Data Software	Fair market value: \$18,350.00 Aggregate total (N): \$18,350.00

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period

Report notes/attachments

In Kind Contributions



39th District Democratic Party Organization

15425 245th Ave SE
Monroe, WA 98272
39lddo@gmail.com
4253197330

Registration Filed

Bonafide District Non-Exempt
Democratic Party
Mini Reporting
Submitted date: 08/21/2023
Certified by eric@northshoretaxaccounting.com
Continuing
39THLD 290

Bank Information

Becu
18333 Bothell Way NE
Bothell, WA 98011
To schedule books review contact eric@northshoretaxaccounting.com

Officers

Eric Halvorson

Ministerial Treasurer
15425 245th Ave SE
Monroe, WA 98272
eric@northshoretaxaccounting.com
2068900795

Jessica Wadhams

Chair
PO Box 1009
Gold Bar, WA 98251
39lddo@gmail.com
4253197330

message.ticket.for

Democratic

Attachments

Name	Description



**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

April 17, 2019

Delivered electronically to Eric Halvorson and Jeniffer Lewis at ehalvorson@hotmail.com and jenlew.resist@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Case 26307

Dear Eric Halvorson and Jeniffer Lewis

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 Glen 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.

PDC staff is reminding you about the importance of filing timely and accurate reports and forfeiting excess anonymous contributions to the State of Washington. PDC staff expects in the future that you will file timely and accurate reports and forfeit excess anonymous contributions in accordance with PDC laws and rules.

If you have questions, you may contact Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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.pdcca.wa.gov

April 17, 2019

Sent Electronically to Glen Morgan at glen@wethegoverned.com

Subject: 39th Legislative District Democratic Central Committee, PDC Case 26307

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against the 39th Legislative District Democratic Central Committee on September 30, 2017.

Your complaint alleged that the 39th Legislative District Democratic Central Committee (Committee) may have violated: RCW 42.17A.245 for failure to electronically file C3 and C4 reports when expending \$5,000 or more, RCW 42.17A.235 for failure to timely and accurately file C3 and C4 reports, RCW 42.17A.220 for accepting anonymous contributions in excess of the allowable limit.

You stated in allegation (3), that your allegations were based “On information and belief” but you failed to provide any evidence to substantiate those allegations. Therefore, staff did not review this allegation.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response from Laura Ewan, legal counsel for 39th Legislative District Democratic Central Committee; and the applicable PDC reports and data in the PDC contribution and expenditure database filed by the Committee, to determine whether the record supports a finding of one or more violations.

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

- The 39th Legislative District Democratic Central Committee is a Bona Fide Political Party Committee for the 39th Legislative District, located in Monroe, Snohomish County.
- The Committee’s most recent C1-PC was filed March 3, 2017 and most recently amended Jan. 8, 2018, with the Committee choosing the Full Reporting option and listing Eric Halvorson as treasurer and Karl De Jong as chairman.

- In her response Ewan stated “the Committee acknowledges that as a result of inexperience and misunderstanding of the requirements of the Fair Campaign Practices Act (FCPA) by those responsible for the Committee’s reporting requirements during the period in question, not all reports were filed in a timely or sufficient manner. With the commencement of the new treasurer’s tenure in 2017, the Committee has addressed its shortcomings and has fulfilled its reporting requirements correctly.”
- PDC staff’s review found the Committee filed all its reports electronically for the 2017 and 2018 election years.
- In her response, Ewan also stated “RCW 42.17A.220(4) regulates accumulated unidentified contributions ‘in excess of one percent **of the total accumulated contributions received in the current calendar year**, or three hundred dollars, whichever is more...’ (emphasis added). In 2016, the Committee did not believe that the total unidentified contributions would surpass the 1% or \$300 cutoff required by law. Any excess was inadvertently retained. We have since submitted that excess to the state treasurer, as required by law, and have implemented procedures to ensure that it will not happen again.”
- The Committee reported a March 30, 2018 expenditure to the WA ST Treasurer for \$450.29 for Extra Anonymous contributions over limit 2014-2016.

Based on these findings staff has determined that, in this instance, failure to file all reports in a timely and accurate manner and the acceptance of anonymous contributions in excess of the allowable limit, does not amount to an actual violation warranting further investigation.

PDC staff is reminding the Committee about the importance of filing timely and accurate reports and forfeiting excess anonymous contributions to the State of Washington in future years in accordance with PDC laws and 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 Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director