



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Toll Free 1-877-601-2828 • E-mail: pdcc@pdc.wa.gov • Website: www.pdc.wa.gov

May 24, 2024

Delivered electronically to 39th Legislative District Democrats at “39liddo@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 149545

Dear 39th Legislative District 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, the PDC has dismissed this matter following 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 your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. Staff expects you to accurately and timely file all required reports of contributions and expenditures, including amendments, when registered under the “Full Reporting” Option, 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, contact Jennifer Hansen toll-free at 1-360-586-4560 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director



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May 24, 2024

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint against 39th Legislative District Democrats, PDC Case 149545

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed February 26, 2024. The complaint alleged the 39th Legislative District Democrats - Exempt Account, a political committee, may have violated RCW 42.17A.205, .235 and .240 and WAC 390-16-125 for acceptance of a contribution exceeding the \$500 limit for committees registered under the “Mini Reporting” Option without registering and reporting contributions and expenditures.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Ministerial Treasurer, Eric Halvorson on behalf of the Respondent; the applicable PDC reports filed by the Respondent; 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 year 2023, the 39th Legislative District Democrats was registered with the PDC as a legislative district bona fide political party committee.
- WAC 390-16-105 describes a campaign’s eligibility and restrictions when registering under mini reporting, specifically that no contribution or contributions from any person may exceed \$500 in the aggregate.
- WAC 390-16-125 states in part that a committee wishing to change from mini to full reporting must apply electronically to the PDC for authorization to change reporting options before the limitations specified in WAC 390-16-105 are exceeded.
- The Respondent updated its committee registration, disclosed its 2023 campaign activity, and received approval to switch its Exempt account from the “Mini Reporting” option to the “Full Reporting” option on August 25, 2023.
- RCW 42.17A.240 requires committees file accurate campaign finance reports with the Public Disclosure Commission.
- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities, including the requirement for monetary contributions to be deposited within five days of receipt and disclosed on a C-3 report.

- The complaint referenced a \$2,000 contribution made by the Washington State Democratic Central Committee to the 39th Legislative District Democrats on August 23, 2023, and alleged that this contribution was made when the Respondent was subject to Mini Reporting, specifically the \$500 aggregate contribution limits from one source.
- In response to the complaint, Ministerial Treasurer Halvorson confirmed that the \$2,000 was reported in the Exempt account.
- During the review of the reports submitted by the Respondent, staff found the C-3 report disclosing the \$2,000 was submitted 148 days late on March 6, 2024, along with five additional C-3 reports, four original C-4 reports and one amended C-4 report.
- The C-4 reports included only contributions and no expenditures.
- The 49th Legislative District Democrats do not have other similar violations of PDC requirements.

It appears that although the \$2,000 contribution made by the Washington State Democratic Central Committee was reported significantly late, the Respondent received it after switching to the “Full Reporting” Option and that the funds were timely deposited. Further, the late reporting was limited to contributions only. Staff found no evidence that the errors were intentional or done to confuse or mislead the public.

Based on our findings staff has determined that, in this instance, the circumstances do not support a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, the 39th Legislative District Democrats will receive a formal written warning concerning the requirements under RCW 42.17A.235 and .240. Staff expects the committee, moving forward, to timely and accurately file all future required reports of contributions. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, contact Jennifer Hansen at 1-360-586-4560 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director

cc: 39th Legislative District Democrats