



**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

May 16, 2019

Delivered electronically to "asotincountydemocrats@outlook.com"

Subject: Complaint filed by Glen Morgan, PDC Case 27163

Dear Asotin County Democratic Central Committee:

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.

However, pursuant to WAC 390-37-060(1)(b), this serves as a formal written warning concerning your failure to timely disclose all contribution and expenditures, or to recertify for Mini Reporting by January 31 of each calendar year. Staff expects you to timely file a new C-1pc each year if you wish to retain the use of Mini Reporting, or that you timely file all future required reports of contributions and expenditures under Full Reporting. 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavallee
Executive Director



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May 16, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Asotin County Democrats, PDC Case 27163

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 1, 2017. The complaint alleged that the Asotin County Democratic Central Committee, a bona fide political party, may have violated RCW 42.17A.235 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 during election year 2017; and RCW 42.17A.205 and WAC 390-16-05 for failure to file Political Committee Registration reports (C-1pc reports) not later than January 31 of each calendar year, to re-certify for mini-reporting in calendar years 2014, 2015, 2016, and 2017.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- The Asotin County Democratic Central Committee has been registered under the Mini-Reporting Option since 2009, allowing them to file a C-1pc by January 31 of each calendar year, certifying that they will raise and spend no more than \$5,000, and receive no more than \$500 in contributions from any single source, and accordingly are exempted from the reporting requirements of RCW 42.17A.225 through .240, as provided by WAC 390-16-105 through -125.
- The Asotin County Democratic Central Committee failed to timely file a new C-1pc by January 31 of calendar years 2014, 2015, 2016, and 2017, requiring them to report on C-3 and C-4 reports on a monthly basis when activity since the last report exceeded \$200, as well as for special reporting periods if the Asotin County Democratic Central Committee participated in elections.
- In calendar years 2016 and 2017, the Asotin County Democratic Central Committee filed C-1pc reports certifying for Mini-Reporting at the end of the year, December and November respectively, which is not sufficient for the requirement in WAC 390-16-115(4) to re-certify for Mini-Reporting, but does show a good faith effort to re-certify for the upcoming calendar years, 2017 and 2018 respectively.

- A review of the Contributions to Candidates and Political Committees Open Data Set of contributions reported received on C-3 and C-4 reports shows no contributions were received from the Asotin County Democratic Central Committee for the last five years.
- Though no evidence was presented to suggest that the Asotin County Democrats would have had reportable activity in calendar years 2015, 2016, and 2017, they failed to timely file their C-1pc reports and were required to file under Full Reporting for those years.

Based on our findings staff has determined that, in this instance, failure to timely file the C-1pc recertifying for Mini Reporting, or to file C-3 and C-4 reports in accordance with Full Reporting, do not amount to actual violations warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), the Asotin County Democratic Central Committee will receive a formal written warning concerning their failure to timely disclose all contribution and expenditures, or to recertify for Mini Reporting by January 31 of each calendar year. The formal written warning will include staff's expectation that the Asotin County Democratic Central Committee timely files a new C-1pc each year if they wish to retain the use of Mini Reporting, or that they timely file all future required reports of contributions and expenditures under Full Reporting. 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director

cc: Asotin County Democratic Central Committee