



**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

July 6, 2020

Delivered electronically to "ghdemocrats@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 26838

Dear Jamie Nichols:

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 will not be conducting a more formal investigation into these allegations or take further enforcement action in this matter since the Grays Harbor County Democratic Central Committee (Committee) completed a Statement of Understanding (SOU) and paid a \$900 civil penalty acknowledging violations of (1) RCW 42.17A.245 by failing to electronically file in 2016 and 2017 and (2) RCW 42.17A.220(4) for accepting over limit anonymous contributions in 2016 and (3) RCW 42.17A.235 and .240 by failing to timely and accurately file Monetary Contribution (C-3) reports and Summary Full Campaign Contribution and Expenditure (C-4) reports disclosing contributions and expenditures undertaken by the Committee for calendar years 2016, 2017 and 2018.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

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

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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July 6, 2020

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Grays Harbor County Democratic Central Committee, PDC Case 26838

Dear: Glen Morgan

The Public Disclosure Commission (PDC) completed its review of the complaint you filed October 13, 2017. Your complaint alleged the Grays Harbor Democratic Central Committee violated (1) RCW 42.17A.235 by failing to timely and accurately file Monetary Contribution (C-3) reports and Summary Full Campaign Contribution and Expenditure (C-4) reports disclosing contributions and expenditures, (2) RCW 42.17A.405 by failing to return over limit contributions within 10 days of receipt, (3) RCW 42.17A.240 by failing to properly maintain a list of contributors and (4) RCW 42.17A.245 by failing to electronically file in 2016 and 2017.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response from Jamie Nichols, Chairperson of the Grays Harbor Democratic Central Committee; and data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

As it was alleged “on information and belief”, PDC staff did not investigate the allegation of RCW 42.17A.240 for failing to properly maintain a list of contributors.

Based on staff’s review we found the following:

- The Grays Harbor Democratic Central Committee disclosed \$29,845.51 in contributions and \$24,096.88 in expenditures during the 2016 election, \$17,605 in contributions had been received and \$13,751 in expenditures made in 2017 and \$19,603 in contributions received and \$14,051 in expenditures made in 2018.
- Most of the Committee’s spending from 2016 – 2018 was party-building activities, fundraising and administrative costs, however in 2016, the Committee made \$4,000 in contributions to candidates.

Election year 2016: On January 30, 2017, the Committee filed C-3 and C-4 reports for the 2016 election year. These reports were between 23 and 206 days late.

Election year 2017: On September 16 and 17, 2019 the Committee filed C-3 and C-4 reports for election year 2017. The late reports were filed between 616 and 981 days late.

Election Year 2018: On September 17, 2019 the Committee filed C-3 and C-4 reports for election year 2018. The late reports were filed between 250 and 584 days late.

Jamie Nichols, Committee Chairperson, stated “I believe it is in the best interest of the Grays Harbor Democrats to resolve this as soon as possible. As a newly elected Vice Chair of the party, with no prior knowledge of this violations before the acceptance of this position, I hope we can work together in order to ensure the proper filing of past paperwork.”

During the 2016 calendar year, the Committee disclosed the receipt of anonymous contributions on line 1a of the 2016 C-4 reports. In an addendum, the Committee provided an “explanation for line item 1d” however Nichols noted this was for items listed on line 1a. In 2016, the Committee was not able to provide information for \$1,197.85 in anonymous contributions. On July 2, 2020, the Committee amended its 2016 C-3 reports, noting the anonymous contributions were a low-cost fundraiser.

The Committee completed a Statement of Understanding (SOU), paid a \$900 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.245, RCW 42.17A.220(4), 42.17A.235 and .240 listed above in accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143. The \$900 penalty assessed in this matter resolves the allegations listed in your complaint.

Based on the above findings, the SOU, and the fact the Committee has timely filed its 2020 reports, staff has determined that, in this instance, this matter does not warrant further investigation. 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 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director