



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

April 17, 2019

Sent electronically to Katie Wilkinson at [docktw@gmail.com](mailto:docktw@gmail.com), Steven Ketelsen at [27thliddems@gmail.com](mailto:27thliddems@gmail.com) and Laura Ewan at [ewan@workerlaw.com](mailto:ewan@workerlaw.com)

Subject: Complaint filed by Glen Morgan, PDC Case 26606

Dear Katie Wilkinson and Steven Ketelsen:

Enclosed is a copy of an electronic letter sent to Glen Morgan, concerning a complaint filed with the Public Disclosure Commission (PDC) alleging that you violated RCW 42.17A.235 and .240 for failure to timely and accurately report contributions, expenditures, and debt.

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)(b), this letter 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 file timely and complete reports in future years in accordance with PDC laws and rules. This includes reporting debt under WAC 390-16-042.

This formal written warning comes with the staff's expectation that you will amend Campaign Summary Receipts and Expenditures (C-4) reports 100706470, 100683684, 100688213, 100710282 and 100775550, by providing the additional required information on the expenditures for signs, expenses and office supplies, and that you will complete reports in future years in accordance with PDC laws and rules.

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 Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto: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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March 14, 2019

Delivered electronically to [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding, 27th Legislative District Democrats, PDC Case 26606

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 13, 2017. Your complaint alleged the 27<sup>th</sup> Legislative District Democrats may have violated RCW 42.17A.235 and .240: (1) by failing to timely and accurately file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contributions and Expenditures reports (C-4 reports), disclosing contributions and expenditures undertaken by the Committee; (2) by failing to timely and accurately disclose debt; and (3) by failing to provide the proper sub-vendor information for expenditures disclosed on C-4 reports.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Laura Ewan, counsel for the 27th District Democrats; 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 27th Legislative District Democrats, a bona-fide political party committee, has been registered with the PDC since 1998.
- In February 2019, the Committee filed its most recent C-1pc under the full reporting option, listing Philip Bradford as campaign manager and Steven Ketelsen as treasurer.

Bradford and Ketelsen replaced Lynda Foster and Katie Wilkinson, who were in the positions from December 2016 until February 2019.

- The Committee files reports for two PACs, one exempt and one non-exempt.
- Between the two PACs, the Committee filed 60 C-3 reports and 24 C-4 reports during the 2015 campaign, amending no reports.
- The Committee filed 91 C-3 reports and 24 C-4 reports during the 2016 campaign, amending no C-4 reports.
- In 2017, the Committee made an error, using an incorrect filer identification number to submit reports. Due to the nature of the error, amending was not an option with the PDC's Online Reporting of Campaign Activities (ORCA) campaign filing software.
- The reports filed under the incorrect filer identification prior to July 2017 were purged. Then, all reports were resubmitted using the correct filer identification number on July 17, 2017.

#### **Allegation #1: Failure to timely and accurately file C-3 and C-4 reports**

- The complaint alleged the Campaign failed to timely file C-3 and C-4 reports due during 2015, 2016 and 2017. You attached a spreadsheet of those reports.
- Laura Ewan, counsel for the 27<sup>th</sup> District Democrats Victory Fund and Exempt Fund, stated, "Contrary to Mr. Morgan's assertions in his complaint and itemized in his Attachment A, the PACs did, in fact, file the vast majority of their reports on time. As evidenced in the attached memos the PACs received from the PDC, the PDC deleted a huge number of reports filed by the PACs in order to correct an erroneous filer identification number, and the PACs had to re-file them. This was, as the PDC stated, the only manner to do so—amending the reports was not an option. The very few reports that actually were filed late were seven days late or less."
- The referenced memos were prepared by Jennifer Hansen, Commission staff Filer Assistance Specialist.

#### **Allegation #2: Failure to disclose debts and obligations on C-4 reports.**

- The complaint alleged that the Committee failed to disclose debts and obligations on C-4 reports. You attached a spreadsheet of those expenditures.
- Ms. Ewan stated, "Without a shred of evidence to support his claims, Mr. Morgan alleges that the seven expenditures listed in his Attachment B should have been reported as debts in previous reporting periods. This is incorrect. These were expenditures, correctly reported as such when the items were acquired/purchased/paid for."
- Under rules in place in 2016 and 2017, the expenditures listed likely should have been reported as debt. WAC 390-16-042 now requires disclosure of each order placed (but not paid), debt or other obligation (except loans) of more than \$750.
- The Committee has been issued a written warning and will be expected to report its debts under WAC 390-16-042.

#### **Allegation #3: Failing to provide sub-vendor information for expenditures disclosed on C-4 reports**

- The complaint alleged that the Committee failed to properly provide detailed descriptions of expenditures. You attached a spreadsheet of those expenditures.

- Ms. Ewan stated, “With respect to the allegation that the PACs violated RCW 42.17A by failing to disclose the quantity of one printing project, prosecution of the PAC for this oversight would not serve the interests of the citizens of the State of Washington.”
- The Committee has been directed to update its C-4 reports to provide additional information for the listed expenditures.

Based on these findings, staff has determined that in this instance, the failure to timely file reports of contributions and expenditures and disclose debts and obligations does not amount to an actual violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(b), the 27th Legislative District Democrats will receive a formal written warning concerning its failure to timely disclose all contributions and expenditures and to disclose debts and obligations.

The formal written warning will include staff’s expectation that the 27th Legislative District Democrats timely file all future required reports of contributions and expenditures and disclose debts and obligations. 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 Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

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/s\_\_\_\_\_

Alice Fiman  
Compliance Officer

Endorsed by,

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