

Respondent Name

Kent Firefighters, IAFF Local 1747 PAC

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#) reported via the portal
(Tue, 15 Oct 2024 at 2:15 PM)

To whom it may concern,

It has come to my attention that once again, the **Kent Firefighters, IAFF Local 1747 PAC** has, once again, violated Washington State's campaign finance laws (**RCW 42.17A**). The details are as follows:

1) Attempt to conceal expenses for shady law firm utilized to prepare misleading documents to the Public Disclosure Commission (Violation of RCW 42.17A.235, RCW 42.17A.240)

Last year, on June 15, 2023, I filed a complaint with the PDC in regards to violations committed by this PAC in their secretive and shady dark money political activity that same year (See **PDC Enforcement Case #139251, original complaint attached for staff reference**). The PDC issued a formal warning letter to this secretive PAC for their violations of Washington State's campaign finance laws that year (See **Warning Lette, PDC Enforcement Cases #139251, attached for staff reference**).

However, as I was reviewing the case files on this campaign finance violator, it became apparent to me that they made the additional choice to willfully, and with malicious intent conceal expenditures from the public and their own members by concealing their legal expenses due to equally shady law firm Bernard, Iglitzen, & Lavitt LLP. This attempt to conceal these expenditures from the public, which they are legally required to report whether they were provided as an in-kind contribution, cash under the table, or a check written by this dark money PAC, yet they chose to be sneaky and conceal the information instead.

Staff can verify this information for themselves by reviewing the .PDF file containing this secretive PAC's "official" response to the PDC, which is still posted on the PDC website, and which I've also attached for staff reference (**See Kent Firefighters IAFF, Local 1747 response letter, PDC Enforcement Case #139251, attached for staff reference**). If you review the metadata for this file, anyone can clearly see that the original author of this letter was "Michael White," who was an attorney working at Bernard, Iglitzen, & Lavitt LLP at the time he drafted this response to the PDC on behalf of the Kent Firefighters, IAFF Local 1747 PAC (**See attached screen grab of metadata**). I've helpfully attached a screen grab of a bio report on this attorney referencing his employment at this shady law firm at the time. He recently departed this law firm.

This letter was obviously written with some knowledge of campaign finance laws and uses the same structure, phrases, footnotes, and style as many other letters openly drafted and written by this same law firm over the years defending their many clients who violate Washington State's glorious campaign finance laws. There is nothing wrong with a violator, even a serial violator like this crew, hiring and utilizing legal counsel. I often recommend they do so when they are caught, and I've actually referred some of these violators to this same shady law firm (or sometimes to Pacifica Law) if they bother to ask.

What is a violation of the law is to conceal this expenditure from the public, and they clearly did so when you review their **C4 reports from 2023** during the time period of this violation and investigation. **Clearly this dark money crew expects that they can benefit from willful deception and dishonesty to continue to violate Washington State's campaign finance laws**, but until now, I had not realized that the law firm colluded in this deception, which appears to be what happened in this case.

This dark money PAC needs to go back and correct their deceptive C4 expenditure reports from 2023 properly reflecting their legal expenditures to this law firm or whatever other law firms they may have utilized.

I will point out for the record and PDC staff's benefit that this dark money PAC crew has also been investigated by the PDC for late reporting recently (See **PDC Enforcement Case #159748**), and it is highly likely that they also utilized legal advice in that investigation as well – although no formal response was posted by the PDC in that case. However, **this one violation I have uncovered may just be the tip of the iceberg for this dark money crew, and it seems likely that they also concealed legal expenditures in the 2024 reporting cycle as well.**

If these guys were so willing to deceive the public, in the middle of an active PDC investigation last year, and possibly earlier this year as well, then the PDC may not be able to trust the reports received from this organization when they pretend they have no additional expenditures that they are concealing from the public at this time.

The PDC staff can only verify the truth now by subpoenaing this shady organization's bank records and verifying their expenditures are actually being reported. In addition, **PDC staff should contact frequently utilized lawfirm – Bernard Iglitzen to get copies (or subpoena copies) of their billing records and time spent on client's defense** to confirm this shady PAC isn't concealing something else.

It is a sad day when we catch dark money crews like this trying to deceive the public about their expenditures while they are in the middle of expensive and aggressive campaigns to acquire more taxpayer cash for themselves. I feel like this won't be the first complaint of this kind I am forced to file on this subject, but I am optimistic that with enough subpoenas and research we can get to the bottom these shady dark money operations. In this case, they clearly laughed at the Reminder and the Warning Letter from the PDC, so enforcement must go to the next level to ensure compliance with the law and a monetary fine is clearly appropriate in this instance.

Let me know if you need anything more on this one.

Best Regards,

Glen Morgan

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

The public has a right to know when shady dark money PACs like this one who spend most of their time attempting to extract more tax dollars from local residents, hides and colludes to conceal the truth about their expenditures - particularly legal expenses as it appears they concealed in this case.

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

All referenced in the complaint and attached as exhibits

List of potential witnesses with contact information to reach them

Everyone at this PAC and their law firm who concealed the truth from the public

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.

Overview

Michael Lee White is a lawyer in Seattle licensed with Washington State Bar Association (WSBA). The license number is #58279. The practice address is *18 W Mercer St Ste 400, Seattle, WA 98119-3971*. The employment company name is *Barnard Iglitzin & Lavitt LLP*. The business phone number is *(206) 257-6032*. The license type is *Lawyer*. The license status is *Active*. The admitted date is *September 27, 2021*.

WSBA Number 58279

Full Name Michael Lee White

Last Name White

First Name Michael Lee

Company Name Barnard Iglitzin & Lavitt LLP

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Seattle
WA 98119-3971

Phone (206) 257-6032

Email white(a)workerlaw.com

July 17, 2023

Ian Spencer
Compliance Coord
Washington State
P.O. Box 40908
Olympia, WA 985
Submitted electron

Re: Case #139251
1747: Alleged Viol

Dear Mr. Spencer:

I am writing in re
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Document properties

Description

File name: 139251 Vote Yes on Proposition One Sp...
File size: 79.9 KB
Title: Not available
Author: Michael White
Subject: Not available
Keywords: Not available
Created on: D:20230719071504-07'00'
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Respondent Name

Vote Yes on Proposition One Sponsored by Kent Firefighters, IAFF Local 1747

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan reported via the portal
(Thu, 15 Jun 2023 at 3:43 PM)

To whom it may concern,

It has come to my attention that Vote Yes on Proposition One Sponsored by Kent Firefighters, IAFF Local 1747 PAC has violated Washington State's campaign finance laws (RCW 42.17A). The details are as follows:

1) Complete and total failure to report any expenses or contributions (Violation of RCW 42.17A.240)

This is an obvious violation committed by a crew of serial campaign finance violators, although they broke the law this time with a new PAC. Even though this committee was "officially" formed on May 1, 2023 to support a major tax increase for the residents of the City of Tukwila, and they clearly indicated they would run this political campaign with "full reporting" indicated in their C-1 Report (see attached), they decided to run a secretive, ghost campaign as far as the public and PDC are concerned.

A well-funded, major political campaign has been launched in the City of Tukwila since May, which includes hundreds of campaign signs littering the community, advertising and other political activity, yet this campaign refuses to follow the law and inform the public about the big dollars being funded by which special interests in an effort to grab their tax dollars. This is very important for the public to know because the election is in a few short months and ballots will be cast like confetti into the community n next month, yet this Mega PAC has chosen secretive, illegal stealth mode to launch their campaign.

Sure, the public sees the signs, but they don't know who is funding this well-funded influence operation, nor can they see how this cash is being spent. The public has a right to know even if this crew wants to hide the truth from the public.

It should be noted that Terry McCartin is the treasurer of this committee and has also been the treasurer of the Kent Firefighters, IAFF Local 1747 Political Committee for more than a decade. So he is not new to campaign disclosure compliance. McCartin managed to timely submit the May 2023 report for his Union Committee, but not for the Tukwila Vote Yes committee. So he knows the law and what is required for compliance, but is obviously indifferent toward violating Washington State campaign laws for the Tukwila Vote Yes committee. Thus, this committee has no excuse for non-compliance.

Well-funded violators of campaign finance laws like this crew, made up of people who are very familiar with the law and know they are violating it should not be allowed to do so with just a minor wrist slap “naughty-naughty” letter. There should be some more serious consequences than just a sternly worded letter when they chose to so blatantly violate the law.

I’ve attached just a small sampling of the many signs posted by this secretive PAC in the community and some social media posts. To date, nothing at all has been reported, yet this information was due on Monday.

Best Regards,

Glen Morgan

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

Everything has been concealed by the local residents of Tukwila. Who is funding this MEGA PAC? How have they spent their money? How do they plan to organize this influence operation to grab more of their tax dollars and give them fewer services? Who is expecting to profit from this exercise, and how much money are they willing to dump into the city? Nobody can tell because they are hiding everything from the public.

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

The full reporting C1, the empty space where reports should be found (if they had submitted them). The evidence of this big campaign being run right now in the city with nobody knowing who is funding it and how they are spending their money

List of potential witnesses with contact information to reach them

The treasurer and all officers

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.



Vote Yes on Proposition One Sponsored by Kent Firefighters, IAFF Local 1747

1012 E. Hemlock St.
Kent, WA 98030
tj592004@yahoo.com
(206)799-5483

Registration Filed

Pac
Full Reporting
Submitted date: 05/01/2023
Certified by tj592004@yahoo.com
2023P
VOTEYP 030

Bank Information

Bank of America
12994 SE Kent Kangley Rd.
Kent, WA 98030
To schedule books review contact tj592004@yahoo.com

Officers

Terry McCartin

Treasurer
1012 E. Hemlock St.
Kent, WA 98030
tj592004@yahoo.com
(206)799-5483

Ballot Propositions

Supporting #1

City Of Tukwila
Initiative or Referendum
2023P

Attachments

Name	Description
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[See Loans →](#)

[See Debts →](#)

Campaign Finance Reports

See the reports filed by the committee. Reports with a strikethrough were amended by another report.

Show entries

[Download 0 rows as CSV.](#)

Period	Report Number	Filed	Report	Form Type	Election Year
No records found					

There are no reports available for this campaign

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[Next](#)

🔍 kent firefighters local 1747

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Tukwila Firefighters IAFF Local 2088

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Firefighters will be out speaking with the community starting this morning! Give them a wave if you see them and ask any questions... See more

VOTE YES ON PROP 1

BY PRIMARY DAY AUGUST 1



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🔍 kent firefighters local 1747

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Tukwila Firefighters IAFF Local 2088

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Firefighters will be out speaking with the community starting this morning! Give them a wave if you see them and ask any questions you have.

We are proud to serve the Tukwila community and encourage you to Vote Yes for Annexation August 1st!

VOTE YES
ON PROP 1

BY PRIMARY DAY AUGUST 1



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KATE
KULLER

VOTE YES
Fire ~~NO~~
PROP 1

VOTE YES
Fire  
PROP 1



SCHOOL
STOP



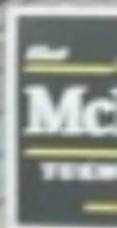


Vote **YES!**
For **Prop 1**





VOTE YES
Fire 
PROP 1



PUEBLO-TORRELLA →
PRESBYTERIAN CHURCH



VOTE YES
Free ~~State~~ ~~of~~ ~~the~~ ~~World~~
PROP 1

BOD
of the
State





July 17, 2023

Ian Spencer
Compliance Coordinator
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908
Submitted electronically to pdc@pdc.wa.gov

Re: Case #139251: Vote Yes on Proposition One Sponsored by Kent Fire Fighters, IAFF Local 1747: Alleged Violations of RCW 42.17A.235 &.240.

Dear Mr. Spencer:

I am writing in response to Glen Morgan's allegation that the Vote Yes on Proposition One Sponsored by Kent Fire Fighters, IAFF Local 1747 PAC (hereinafter referred to as "the Campaign") violated campaign finance disclosure statutes. Mr. Morgan alleges that the Campaign failed to timely and accurately file contribution and expenditure reports under RCW 42.17A.235 and 42.17A.240. My understanding of campaign finance disclosure requirements was that the Campaign did not have to report using old, generic campaign signs as an in-kind contribution to the Campaign. Following the complaint, I spoke with a Public Disclosure Commission (PDC) compliance representative that corrected my understanding. I have since filed an amended C4 report to disclose that the Kent Firefighters, IAFF Local 1747 Political Committee (hereinafter referred to as "1747 PAC") provided an in-kind contribution to the Campaign of \$400 for the use of these yard signs. Because I reported the purchase of these signs in a previous campaign, the Campaign did not intend to hide its use of old campaign signs, I updated the Campaign's disclosure to include the use of these signs, and 1747 PAC is committed to transparency, I ask that the PDC decline to find Local 1747 in violation of the statute.

For background, Kent Fire Fighters, IAFF Local 1747, is a public-sector labor union representing the firefighters and professional staff of the Puget Sound Regional Fire Authority. Local 1747 established and maintains 1747 PAC as continuing political action committee. I am the treasurer for 1747 PAC.

Puget Sound Fire has gone through several expansions, having been originally formed when the Kent Fire Department and King County Fire District 37 joined together. Since then, the City of SeaTac and King County Fire District 43 have merged into Puget Sound Fire. Each merger required a vote by the jurisdiction's citizens, and each of these campaigns was called "Proposition 1." Additionally, Puget Sound Fire has gone to the ballot for property tax levy and fire benefit charge authorizations, and these ballot measures have also been "Proposition 1."

Local 1747, through local ballot measure campaigns, has supported each of these Proposition 1 campaigns. This support included purchasing generic, fire department oriented "Vote Yes on Prop 1" signs. Following these campaigns, Local 1747 members collect the generic signs and store them for the eventual next Proposition 1 campaign. For instance, Mr. Morgan's photos show differing versions of these used signs, demonstrating that they were not all purchased simultaneously.

Recently, Puget Sound Fire contracted with the City of Tukwila for fire protection services. Now, Tukwila is asking voters whether the City should formally merge with Puget Sound Fire. Local 1747 supports this campaign which voters will see as “Proposition 1.” For transparency, Local 1747 established a local ballot measure campaign to support this latest version of Proposition 1. Local 1747 anticipated that its PAC would be the significant (if only) funder of the Campaign through 1747 PAC and previous Proposition 1 campaign contributions. As required by campaign finance statutes, regulations, and guidance, and as Local 1747 was aware, the Campaign’s name includes “Sponsored by Kent Firefighters, IAFF Local 1747.” I am the treasurer for the Campaign, and I spoke with a PDC compliance representative on approximately April 30, 2023, to help comply with the reporting requirements for the initial establishment of this committee.

With the campaign underway, Local 1747 members gathered again to put out the generic, fire department oriented “Vote Yes on Prop 1” signs. Local 1747 volunteers distributed approximately 200 of these signs around the City of Tukwila on approximately June 3, 2023.

With this background, I understood the campaign finance disclosure requirements to mean that I did not have to report the use of the old generic signs because I was unaware that use of these signs were considered a campaign contribution. RCW 42.17A.235(1)(a) requires campaigns to file contributions received and expenditures made as a political committee within the statute’s timeline. RCW 42.17A.240 details what needs to be in these reports. I did not include the value of these signs in the June 2023 C4 report because I did not understand the use of old signs—not purchased by the Campaign, previously disclosed to the PDC, and owned by the Campaigns sponsoring entity—was a contribution to the new campaign,

After I received Mr. Morgan’s PDC compliance allegation, I contacted the PDC on July 5, 2023, to discuss whether my understanding of campaign finance requirements was incorrect. A PDC compliance officer informed me that I did need to disclose the use of the signs as an in-kind contribution from a previous Proposition 1 campaign to the Campaign. The compliance officer instructed me to assign a fair market value to the sign. I assigned a value of \$2.00 per sign. With approximately 200 signs, the total in-kind contribution was \$400. I filed an amended C4 on approximately July 10, 2023, disclosing an in-kind contribution from the Vote Yes on Prop One (2021) campaign to the Campaign.¹ As a result, the Campaign is now fully compliant with disclosure requirements.

Outside of my attempts to comply with campaign finance requirements, Mr. Morgan makes several subjective and unfounded claims about the Campaign. First, Mr. Morgan claims the Campaign “refuses to follow the law and inform the public about the big dollars being funded...” I initially worked with the PDC to ensure the Campaign followed the law. And when it came to my attention that the Campaign might be out of compliance, I immediately contacted the PDC to rectify the issue. Moreover, Local 1747 could have funded this ballot measure campaign through alternative means and disclosures. Instead, it opted to disclose via local ballot measure reporting, the most thorough and transparent form of reporting. This form of disclosure also requires 1747 PAC to be the named sponsor, so the public knows where the campaign funds come from. Second, Mr. Morgan cites my experience as a treasurer for 1747 PAC. I am a volunteer for both PACs, which

¹ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110157621>

have straightforward expenditures. I do not have experience with in-kind contributions because we normally do not have this form of contribution. Finally, the Campaign is not a “major political campaign.” Most of the Campaign’s funds are carryover from a previous Proposition 1 campaign funded by Local 1747 with some additional funds coming from Local 1747.

In conclusion, Local 1747, 1747 PAC, the Campaign, and I strive to follow campaign finance disclosure laws, regulations, and guidance. My omission of the in-kind contribution for using old signs was due to my misunderstanding of campaign finance law. Once it was brought to my attention, I immediately sought guidance from the PDC and filed amended reports to come into compliance. Furthermore, the fair market value and number of signs resulted in a comparatively small contribution. For these reasons, I request the PDC find the Campaign and 1747 PAC in compliance with disclosure requirements and decline to issue any enforcement action against these entities.

Sincerely,

Terry McCarten