



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

Feb. 6, 2019

Delivered electronically to "bachamp@comcast.net"

Subject: Complaint filed by Glen Morgan, PDC Case 26478

Robert Champion,

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below 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.

PDC staff is reminding you about the importance of timely filing reports in future years in accordance with PDC laws and rules. PDC staff expects that you will file timely in future years in accordance with PDC laws and rules.

If you have questions, you may contact me at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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Feb. 6, 2019

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

Subject: Complaint regarding Robert Champion, PDC Case 26478

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed, Oct. 12, 2017. Your complaint alleged that Robert Champion may have violated RCW 42.17A.235, .240, .320, .465, .555 and .700 by: (1) failing to accurately and timely file Campaign Summary Receipts and Expenditure reports (C-4), and several Monetary Contribution reports (C-3); (2) failing to properly breakdown expenses; (3) failing to include the committee address in sponsor identifications statements, (4) failing to report a loan; (5) failing to identify a lender's occupation and employer information; (6) failing to disclose ownership of a Public Employees Retirement System (PERS) account; and (7) a prohibited use of public resources for campaign purposes.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the Nov. 8, 2017 response Robert Champion sent to the Washington State Attorney General (ATG); and the applicable PDC reports and data in the PDC contribution and expenditure database filed by Robert Champion, to determine whether the record supports a finding of one or more violations.

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

- Robert Champion was elected to the Mukilteo City Council on Nov. 5, 2013 and re-elected on Nov. 7, 2017.
- Robert Champion chose mini reporting in 2013 and full reporting in 2017.
- Mukilteo City Council members are not eligible for PERS accounts.

**Allegation #1 and #2: failure to file timely and accurate C-3 and C-4 reports.**

The complaint alleged Robert Champion failed to file timely and accurate C-3 and C-4 reports, including failing to properly breakdown expenses.

- Three C-4 reports were late, with two filed one day late and one filed six days late.
- Robert Champion stated he “has taken corrective action to ensure that the treasurer files report in a timely manner for all future reports.”
- Robert Champion also responded regarding the failure to breakdown and alleged in-kind contribution from Robert Kroll by stating “Mr. Knoll is a campaign volunteer, no longer employed as a campaign professional since 2013 and is not seeking compensation in any form for hours provided. As such - his volunteer services are not debt to the campaign or in-kind professional services.”
- Regarding the failure to report the filing fee and domain registration, Robert Champion amended C-4 reports 100795341, 100795339, and 100795340 on Oct. 23, 2017 to include the expenses noted in the complaint.

**Allegation #3 failure to include the committee address in sponsor identifications statements.**

The complaint alleged Robert Champion’s website identifies the sponsor as his own committee, however he fails to include the committee's address.

- In his response, Robert Champion stated, “The campaign has taken corrective action to include the committee address in the Sponsor ID Statement.”

**Allegation #4 and #5: failing to report a loan and failure to identify a lender’s occupation and employer information.**

The complaint alleged Robert Champion loaned money to his campaign however did not include his occupation, name, city, and state of employer on the C-3.

- Robert Champion filed an updated C-3 100795343 on Oct. 23, 2017 to provide the information.

**Allegation #6 failing to disclose ownership of a Public Employees Retirement System (PERS) account and #7 for a prohibited use of public resources for campaign purposes.**

The complaint alleged Robert Champion did not disclose on F-1 reports ownership of a PERS retirement account as an asset and used the professional portrait from the City of Mukilteo's website on campaign materials, including his website.

- Robert Champion responded these allegations are false.
- Regarding a PERS account, “This allegation has no merit. Members of the Mukilteo City Council do not qualify for retirement benefits, and as such do not have related ownership of a PERS retirement account.”
- The photo, he states, “was taken professionally prior to my time on the Mukilteo City Council and is my property – allowable for use in a political campaign.”

Robert Champion made minor or ministerial errors on C-3 and C-4 reports filed for the 2017 election, including the sub-vendor breakdown and details of certain expenditures. Upon

notification of these errors, Champion timely amended the reports making the necessary technical corrections.

Based on these findings staff has determined that, in this instance, failure to timely file C-3 and C-4 reports and include the committee address in the Sponsor ID Statement does not amount to an actual violation warranting further investigation.

PDC staff is reminding Robert Champion about the importance of timely and accurate disclosure of sponsor identification, campaign contribution and expenditure information, including timely and accurately filing C-3 and C-4 reports and the proper breakdown of expenditures.

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 me at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

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

Alice Fiman  
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