



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 6, 2025

Delivered electronically to clark4olympia@gmail.com

Subject: PDC Case 175383

Clark Gilman:

The Public Disclosure Commission (PDC) completed its review of the complaint filed July 2, 2025 by Glen Morgan. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately disclose contributions and expenditures on Cash Receipts Monetary Contributions (C-3) reports and Campaign Summary Receipts and Expenditures (C-4) reports, disclosing funds leftover from the 2021 election year.

Applicable Laws & Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.240 requires committees to file accurate campaign finance reports with the Public Disclosure Commission.

Background & Findings

- Clark Gilman is a 2025 Candidate for Olympia City Council. Gilman was elected to the same position in 2021.
- The complaint noted the discrepancy between the ending balance for Gilman's 2021 Committee and the starting balance for the 2025 Committee, Committee to Retain Clark Gilman.
- In response to the complaint, Gilman stated, "He (the complainant) has accurately pointed out that my previous campaign made errors in reporting by missing expenditures on our PDC filings." The written response also noted Gilman was "unaware of the reporting requirements for a surplus funds account and did not file a report describing the creation of the account."
- Working with a PDC disclosure specialist, Gilman amended C-4 reports originally filed Dec. 10, 2021 and Jan. 10, 2022 to show a transfer to a Surplus Funds account and then a C-4 report originally filed Feb. 9, 2025. Gilman also filed a C-3 report for the period of Jan. 29, 2025.
- The amended C-4 reports and Jan. 29, 2025 C-3 report show a transfer to a Surplus Funds Account and then a transfer of \$7,100 from the Surplus Funds Account to the 2025 Committee account.

- Gilman stated: “There is no missing money, but there were mistakes made in public disclosure reporting and I take responsibility for those errors.”

Summary and Resolution

You promptly responded to the complaint and worked with PDC staff to correctly report the surplus funds transfers.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning the failure to timely disclosure of all contribution and expenditures. The formal written warning includes staff's expectation you timely report all Surplus Funds Account transfers timely and accurately. 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, contact Alice Fiman at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed by Alice Fiman

Alice Fiman
Compliance Manager

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Glen Morgan