



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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April 6, 2017

Respondent:

San Juan County Treasurer, Rhonda Pederson, treasurer@sanjuanco.com

Complainant:

Glen Morgan, glenmorgan89@gmail.com

SENT VIA E-MAIL

Subject: San Juan County, PDC Case 16067

Dear Treasurer Pederson and Mr. Morgan:

On March 30, 2017, the Public Disclosure Commission (PDC) received a complaint from Mr. Morgan alleging that San Juan County had failed to file the 2016 annual report regarding public accounts of governmental entities held by financial institutions for calendar year 2015 as required by RCW 42.17A.570.

RCW 42.17A.570 establishes a requirement that county treasurers file a report, the T1 report, to provide information to the PDC:

After January 1st and before April 15th of each calendar year, the state treasurer, each county, public utility district, and port district treasurer, and each treasurer of an incorporated city or town whose population exceeds one thousand shall file with the commission:

(1) A statement under oath that no public funds under that treasurer's control were invested in any institution where the treasurer or, in the case of a county, a member of the county finance committee, held during the reporting period an office, directorship, partnership interest, or ownership interest; or

(2) A report disclosing for the previous calendar year: (a) The name and address of each financial institution in which the treasurer or, in the case of a county, a member of the county finance committee, held during the reporting period an

office, directorship, partnership interest, or ownership interest which holds or has held during the reporting period public accounts of the governmental entity for which the treasurer is responsible; (b) the aggregate sum of time and demand deposits held in each such financial institution on December 31; and (c) the highest balance held at any time during such reporting period. The state treasurer shall disclose the highest balance information only upon a public records request under chapter 42.56 RCW. The statement or report required by this section shall be filed either with the statement required under RCW 42.17A.700 or separately.

RCW 42.17A.570.

After sending the complaint to San Juan County, Treasurer Pederson provided a copy of the transmittal of the 2015 T1 report that had been submitted to the PDC by email on March 20, 2016. Unfortunately, there was a small error in the PDC email address (it was sent to pcd rather than pdc@pdc.wa.gov), and the report was not received and scanned into our database.

The County was unaware that there had been a transmittal error, and the PDC appears to have been unaware that the T1 had not been filed. The 2015 T1 report for San Juan County has now been filed, and the 2016 T1 has also been received at the PDC.

The 2015 T1 report was timely sent by San Juan County. No one notified the County that the report had not been received. According to the information published on the PDC website, the purpose of the T1 report is to disclose "whether a public treasurer has invested funds under his or her control in an institution in which the treasurer has a partnership or ownership interest or holds an office or directorship." The County's 2015 T1 report did that, and was signed by the Treasurer, and two members of the County's finance committee.

In light of the fact that the report was prepared and signed appropriately, it appears that the requirement of the report was substantially met. Therefore the PDC is closing its review of this case, and will not be conducting a more formal investigation into this complaint or pursuing further enforcement action.

Sincerely,


Evelyn Fielding Lopez
Executive Director

cc: Linda Dalton, AGO Campaign Finance Unit