



**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.pdca.wa.gov](http://www.pdca.wa.gov)

December 19, 2018

Delivered electronically to "javiervaldez@comcast.net"

Subject: PDC Case 27170

Dear Javier Valdez:

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 will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of the timely disclosure of contribution and expenditure activity, including complete and accurate disclosure of details required by statute and rule. Staff advises you to remain mindful of debt reporting under the current version of RCW 42.17A.240(8) which requires reporting of any debt with a value of more than \$750 which has not been paid within 5 business days within 30 days of an election, or within 10 business days during any other period.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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December 19, 2018

Delivered electronically to “glenmorgan89@gmail.com”

Subject: Complaint regarding Javier Valdez, PDC Case 27170

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on November 1, 2017. Your complaint alleged that Javier Valdez may have violated RCW 42.17A.235 for failure to timely report contributions and expenditures, and RCW 42.17A.240 for failure to accurately report debts and detailed breakdowns of expenditures.

PDC staff reviewed your allegations, and as a result of staff’s initial review, we found the following:

- From July through October of 2017, Javier Valdez filed at least 3 C-4 reports for election year 2018, between 1 and 35 days beyond the statutory deadlines set by RCW 42.17A.235, late disclosing \$14,809 in contributions, or 17% of total contributions for the election cycle, and \$3,070 in expenditures, for 5% of total expenditures for the 2018 election campaign.
- Javier Valdez also failed to report at least 3 debts for political advertising purchased in June of 2017, as required by the version of RCW 42.17A.240 in effect at the time, which required reporting of any debts above \$50 that had been outstanding for more than 30 days, or above \$250 with no time constraints.
- Javier Valdez also failed to provide detailed breakdowns of at least 5 expenditures, including the number of items printed for political advertising as required by RCW 42.17A.240 and WAC 390-37-063.
- Javier Valdez also failed to provide sub-vendor breakdowns for at least the same 5 expenditures, disclosing the agents providing printing and mailing services as agents of the campaign, as required by WAC 390-37-205.
- Javier Valdez has no prior found violations of PDC laws or rules.

Based on these initial findings, staff has determined that in this instance, failure to timely, accurately, and completely report contribution and expenditure activity does not amount to an actual violation warranting further investigation.

PDC staff is reminding Javier Valdez about the importance of the timely disclosure of contribution and expenditure activity, including complete and accurate disclosure of details required by statute and rule. Staff advises Javier Valdez to remain mindful of debt reporting under the current version of RCW 42.17A.240(8) which requires reporting of any debt with a value of more than \$750 which has not been paid within 5 business days within 30 days of an election, or within 10 business days during any other period.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Javier Valdez