



**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)**

Nov. 13, 2018

Delivered electronically to "pdcc@harbornet.com"

Subject: PDC Case 29101

Dear: Patty Rose

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) on Dec. 21, 2017 against the Pierce County Committee on Political Education.

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding the Committee about the importance of timely filing Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports) in accordance with PDC laws, rules and reporting requirements.

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

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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Nov. 13, 2018

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

Subject: Complaint regarding Pierce County Committee on Political Education, PDC Case 29101

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against the Pierce County Committee on Political Education, a Political Committee that has registered with the commission since at least 1996. The complaint alleged the Committee violated RCW 42.17A.235 and .240 by: (1) failing to timely file Campaign Summary Receipts and Expenditure reports (C-4), and several Monetary Contribution reports (C-3); (2) failing to provide the proper reporting breakdown for a number of expenditures made by the campaign; and (3) failing to report debts and obligations.

PDC staff reviewed the allegations listed in the complaints, the statutes, rules, and reporting requirements, the Committee Registrations (C-1pc reports) C-3 and C-4 reports filed by the Pierce County Committee on Political Education, and the response Dmitri Iglitzen, Counsel for Pierce County Committee of Public Education, submitted to the Washington State Attorney General’s Office on Feb. 15, 2018.

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

- The Committee has been registered and reporting with the PDC dating back to 1996.
- During the 2016 election year, the Committee filed 29 C-3 and C-4 reports. During the 2017 election year, the Committee filed 18 C-3 and C-4 reports.
- Of the 28 C-3 and C-4 reports listed in the complaint as filed late, 13 were amended reports.
- The two items alleged as debt were properly reported expenditures, not debt.
- The WSLC COPE is the Washington State Labor Council’s Committee on Political Education Convention. The items alleged as failure to identify a subvendor were

purchases by the Committee of tickets to an event at the Convention and items available at the Convention.

- In his response, Mr. Iglitzen noted “There were no subvendors to identify from the WSLC COPE barbeque tickets. Nor would the Committee’s purchase of pins from the WSLC COPE trigger any obligation to identify a subvendor.”

Based on these findings, and the fact (1) in 2016, the 21-Day and 7-Day Pre-Primary Election plus the 21-Day and 7-Day Pre-General Election C-4 reports were all originally filed timely and (2) while the Committee did file late reports prior to the 2017 election, in 2018, the 21-Day Pre-Primary Election plus the 21-Day and 7-Day Pre-General Election C-4 reports were filed timely, staff has determined that in this instance, failure to timely file reports of contributions and expenditures does not amount to a material violation warranting further investigation.

The PDC is reminding Pierce County Committee on Political Education about the importance of timely filing C-3 and C-4 in accordance with PDC laws, rules and reporting requirements. 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 Alice Fiman at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at [alice.fiman@pdc.wa.gov](mailto:alice.fiman@pdc.wa.gov).

Sincerely,

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

Alice Fiman  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
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