



**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)**

March 7, 2019

Delivered electronically to Katherine Burke at [kateburke509@gmail.com](mailto:kateburke509@gmail.com)

Subject: Complaint filed by Glen Morgan, PDC Case 29507

Dear Ms. Burke:

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 in the letter to Mr. 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.

However, PDC staff is reminding you about the importance of filing timely and accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by your Campaign, including expenditures for debt, and the importance of properly reporting the purpose of expenditures, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

If you have questions, you may contact Erick Agina at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavalley, Executive Director





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March 7, 2019

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

Subject: Complaint regarding Katherine Burke, PDC Case 29507

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on December 22, 2017. Your complaint alleged that Katherine Burke, a first-time candidate for Council Member for the City of Spokane in 2016, may have violated RCW 42.17A.235 by failing to timely and accurately file C-3 and C-4 reports, including the failure to properly report the purpose of expenditures, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205, and RCW 42.17A.240 by failing to timely and accurately report debt.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the People for Kate Burke (Campaign); and the response provided by the Campaign.

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

- On August 4, 2016, Katherine Burke timely filed a C-1 report declaring her candidacy for City Council Member for the City of Spokane in 2017 and selected the Full Reporting Option.

Allegation One: Failure to timely file C-3 and C-4 reports.

- PDC staff reviewed the 21 C-3 and C-4 reports you attached in the spreadsheet. Staff found that ten of the alleged late-filed reports were filed between one and two days late. For the remaining 11 alleged late-filed C-3 and C-4 reports, seven were filed timely and three were not required because of lack of activity. The remaining report was 53 days late for a \$15-dollar contribution received from Lauren Currin on January 2, 2017.
- In its response to this allegation, the Campaign, by way of the campaign treasurer, Geoffrey Bracken, stated "without the Committee conceding to his allegations, Mr. Morgan has identified 21 late filings, including ten which were 1-2 days late and several duplicate reports. These filings pale in comparison to the overwhelming successful and timely filings over the Committee's reporting history."

Allegation Two: Failure to timely and accurately report debt.

- PDC staff reviewed the 48 alleged unreported debts you attached in the spreadsheet. Staff found that 20 items on the spreadsheet appear to be orders placed and paid for during the same reporting period. For the remaining 28 items, staff noted that they appear to be debts that should have been reported on earlier C-4 reporting cycles prior to the payments being made.

Allegation Three: Failure to properly report the purpose of expenditures.

- Staff reviewed the description of the payments made to the 18 vendors you attached in the spreadsheet. Except for a few vendors, staff found that most of the expenses lacked proper description(s) or additional information as required by law. For example, on July 21, 2017 and August 16, 2017, Winpower Strategies was paid \$2,970.69 and \$2,470.69 for *primary mailer #1* and *primary mail piece #2 production*, respectively. The number of items printed for both mailers was not included. A more detailed description that includes the number of items printed should have been included in the report by the Campaign.

Staff noted that there were expenditures made by the Campaign either to a vendor or consultant for which a more detailed explanation or description should have been provided. Staff further noted that some of the alleged unreported debts should have been reported on the reports covering the reporting periods immediately before the debts were paid. However, those shortcomings are mitigated by the fact that Katherine Burke was a first-time candidate who did not have any prior experience with the PDC reporting requirements and has no prior violations.

Based on these findings staff has determined that, in this instance, Katherine Burke's failure to file all reports in a timely and accurate manner, including expenditures for debt, and the failure to properly report the purpose of expenditures, does not amount to an actual material violation warranting further investigation.

However, staff is reminding the Campaign about the importance of filing timely and accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the Campaign, including expenditures for debt, and the importance of properly reporting the purpose of the expenditures, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov)

Sincerely,

Endorsed by,

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavallee, Executive Director

cc: Katherine Burke  
Geoffrey Bracken, Treasurer