



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 • Website: www.pdca.wa.gov

March 15, 2019

Delivered electronically to Dmitri Iglitzin at iglitzin@2workerlaw.com

Subject: Complaint regarding the Washington State Labor Council AFL-CIO-PPP, PDC Case 29510

Dear Mr. Iglitzin:

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 sent 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 the Committee about the importance of filing timely and accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the Committee, including expenditures for debt, and the importance of properly reporting the purpose of expenditures, specifically to include the number of items and sub-vendor information where applicable 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@pdcc.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 15, 2019

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding the Washington State Labor Council AFL-CIO-PPP, PDC Case 29510

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 22, 2017. Your complaint alleged that the Washington State Labor Council AFL-CIO-PPP (Committee), a Continuing Other Political Committee, may have violated RCW 42.17A.235 and RCW 42.17A.240: (1) by failing to timely and accurately file C-3 and C-4 reports; (2) by failing to properly report the purpose of expenditures; and (3) by failing to timely and accurately report debt.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable C-3 and C-4 reports filed by the Committee; and the response provided by the Committee.

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

- On February 1, 2012, the Committee filed a Political Committee Registration (C-1pc report), selecting the Full Reporting Option and listing Lynne Dodson as Treasurer and Campaign Manager.
- On January 14, 2016, the Committee filed an amended C-1pc, selecting the Full Reporting Option and listing Lynne Dodson as Treasurer and Campaign Manager.

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

- PDC staff reviewed the 77 C-3 and C-4 reports included with your complaint in a spreadsheet (Exhibit A). Staff found that 23 of the alleged late-filed reports were filed timely and 17 had no reportable activity, thus the Committee was not required to report. 19 were filed between one and ten days late and three were filed between 16 and 24 days late. The remaining 15 reports, accounting for \$6,857.02 in contributions and \$0.00 in expenditures, were filed between 65 and 165 days late.

Allegation Two: Failure to timely and accurately report debt.

- PDC staff reviewed the 14 alleged unreported debts you attached in the spreadsheet (Exhibit B). Except for items 2, 3, 9 and 10, for payments made to Grays Harbor Stamp Works for \$633.94, \$286.92, 984.41 and \$1,623.24, respectively, staff found that most of the remaining items in the attached spreadsheet were orders paid at the time the orders were placed for things like space rental or event table(s) that were ordered and paid for at the time the orders were placed, during the same reporting cycle. Additionally, you did not

provide any evidence to show that any of the expenditure depicted in your spreadsheet was preceded by a promise to pay in an earlier reporting period.

- In its response to this allegation, the Committee, by way of its counsel stated, “Mr. Morgan methodically alleges that certain expenditures made in a given report should have been reported as debt in the prior reporting cycle. Mr. Morgan provides utterly no factual basis for this assertion that the various expenditures listed were actually incurred as debts earlier than when they were reported as expenditures. More importantly, Mr. Morgan appears to confuse expenditures and debts.”

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

- Staff reviewed the description of the payments made to the 23 vendors/individuals on your spreadsheet (Exhibit C). Staff found that most of the expenses/payments lacked the proper descriptions or additional information as required by RCW 42.17.240, WAC 390-16-037 and WAC 390-16-205.

As noted above, staff found that there were expenditures made by the Committee either to a vendor or consultant for which a more detailed explanation or description should have been provided. Additionally, there were some late C3 and C4 reports, including a few unreported expenditures for debts. However, these deficiencies are mitigated by the fact that the Committee has no prior violations.

Based on these findings staff has determined that, in this instance, the failure to file timely and accurate C-3 and C-4 reports, including expenditures for debt, and the failure to properly report the purpose of expenditures, does not amount to an actual violation warranting further investigation.

However, staff is reminding the Committee about the importance of filing timely and accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the Committee, including expenditures for debt, and the importance of properly reporting the purpose of expenditures, specifically to include the number of items and sub-vendor information where applicable, 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

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

s/ _____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director

cc: Dmitri Iglitzin, Attorney for Washington State Labor Council AFL-CIO-PPP
Lynne Dodson, Treasurer/Campaign Manager