



**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)

November 15, 2018

Delivered electronically to Gayle Brandon-Behrend, Treasurer for Citizens for Judicial Excellence at "melissa@cjepac.com"

Subject: PDC Case 34588

Dear Gayle Brandon-Behrend:

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 all contribution and expenditure activities, specifically those occurring during the accelerated reporting schedule prior to and after any election in which CJEPAC participates by making monetary or in-kind contributions to candidates.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

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

Jennifer Hansen  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavallee

Executive Director

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November 15, 2018

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding Citizens for Judicial Excellence, PDC Case 34588

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 11, 2018. Your complaint alleged that Citizens for Judicial Excellence (CJEPAC) may have violated RCW 42.17A.235, .265, .205, .220, .320, .255 for failure to timely and accurately disclose contributions, expenditures, books of account, committee registration, and sponsor ID.

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

- No evidence was provided to substantiate any allegations outside of late filing of C-3 and C-4 reports in violation of RCW 42.17A.235.
- The majority of the alleged violations were found for C-3 and C-4 reports disclosing activity required to be submitted on a monthly basis when CJEPAC was not participating in the election.
- Citizens for Judicial Excellence submitted C-4 reports during 2017 according to the accelerated reporting schedule required for committees participating in the 2017 election. However, they did file a small number of C-3 reports late, which included deposits filed monthly rather than weekly as required.
- PDC staff's review of the contribution and expenditure activities of CJEPAC during calendar years 2015 and 2016 did not show evidence of participation in the elections requiring them to follow an accelerated reporting schedule.

Based on these findings, staff has determined that in this instance, failure to timely file a small number of C-3 reports covering activity during one election cycle, does not amount to an actual material

violation warranting further investigation. PDC staff is reminding Citizens for Judicial Excellence about the importance of the timely disclosure of all contribution and expenditure activities, specifically those occurring during the accelerated reporting schedule prior to and after any election in which CJEPAC participates by making monetary or in-kind contributions to candidates.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

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

Jennifer Hansen  
Compliance Officer

Endorsed by,

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

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Citizens for Judicial Excellence