



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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Subject: Complaint regarding PDC Case 34803

Dear Lora Brabant, WSSR-PAC Treasurer

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) on April 11, 2018 against the Washington State School Retirees PAC.

As noted in the letter to Mr. Morgan, the PDC has will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

Pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning the WSSR-PAC's failure to file 21- and 7-day Pre-Primary Summary Full Campaign Contributions and Expenditure reports (C-4 reports) and Post-primary C-4 reports for election year 2018, in accordance with the PDC reporting requirements.

PDC staff expects that WSSR-PAC will timely file 21-Day and 7-Day Pre and Post-primary C-4 reports in future years in accordance with PDC laws and rules, and also timely file C-3 reports, including weekly C-3 reports beginning June 1 of the calendar year when the committee is participating in the election.

The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 \_\_\_\_\_  
Peter Lavalley  
Executive Director



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Delivered electronically to Glen Morgan at [glenmorgan89@gmail.com](mailto:glenmorgan89@gmail.com)

Subject: Complaint regarding Washington State School Retirees PAC, PDC Case 34128

Dear Mr. Morgan

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against Washington State School Retirees PAC (WSSR–PAC), a continuing political committee registered with the commission since 2002.

The complaint alleged violations of RCW 42.17A.235 and .240 by failing to timely file complete and accurate Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports).

PDC staff reviewed the allegations listed in the complaints in light of PDC laws and rules in order to determine whether a formal investigation or enforcement action is warranted. Staff reviewed the C-3 and C-4 reports filed by WSSR–PAC and the response from Lora Brabant, WSSR–PAC Treasurer.

We found the following:

- WSSR–PAC filed a Committee Registration (C1-pc report) on March 8, 2002, registering with the PDC as a Continuing Committee to “support of candidates and issues relating to school retirees.”
- WSSR–PAC filed its most recent C1-pc report on January 4, 2018, as a New Continuing committee, selecting the Full Reporting Option and listing Louie Osmonovich as Committee Manager and Lora Brabant as Treasurer.
- WSSR-PAC filed a C-4 report on August 1, 2018, disclosing \$28,030 in monetary and in-kind contributions received, and \$7,198 in expenditures during the 2018 election. Of the 31 allegations of late filed C-3 and C-4 reports listed in your complaint, 28 of the allegations concerned contribution and expenditure information that was disclosed on amended C-3 and C-4 reports filed by the WSSR-PAC. For example, you alleged Report #100796294 was a C-4 report filed 109 days late, but it was an amendment for Report

#100782064, a July 2017 C-4 report was filed on August 12, 2017, disclosing a different carryforward amount.

- The three non-amended alleged WSSR-PAC late filed reports included: (1) The December 2017 C-4 report which was filed on January 12, 2018, two days late disclosing \$474 in contributions received and \$120 in expenditures made; (2) The July 2017 C-4 report which was filed on August 12, 2017, two days late disclosing \$337 in contributions received and \$532 in expenditures made; and (3) The July 2016 C-4 report which was filed on August 4, 2016, six days early disclosing \$328 in contributions received and no expenditures made.
- WSSR-PAC did not file 21-Day and 7-Day Pre-Primary Election C-4 reports and Post-Primary Election C-4 reports through the 2017 election. Ms. Brabant stated that the Committee did not make contributions to candidates prior to the primary election being held or otherwise participate in the primary elections until 2018. Staff's review found that WSSR-PAC did appear to file C-3 reports weekly for most of calendar year 2017, and that most of the contributions appear to have been timely deposited within five business days of receipt.
- On July 9, 2018, WSSR-PAC filed a C-4 report for June 2018 disclosing \$6,000 in expenditures made for contributions made to 2018 Legislative candidates, that should have been filed on the 21-Day Pre-Election C-4 report. While WSSR-PAC failed to file a 7-Day Pre-Election C-4 reports, the July 2018 C-4 report was filed on August 1, 2018, disclosing \$332 in contributions received and \$7.17 in expenditures.
- WSSR-PAC did appear to file C-3 reports weekly for calendar year 2018, and that most of the contributions appear to have been timely deposited within five business days of receipt.

PDC staff dismissed the seven allegations listed in your complaint that was based "on information and belief" in accordance with RCW 42.17A.755(1), since you failed to provide any evidence to support or substantiate those allegations.

Staff's review determined the Committee failed to timely file a small number of initial C-3 and C-4 reports and amended C-3 and C-4 reports disclosing minor contribution and expenditure activities.

Based on these findings, and the facts that WRRP-PAC timely filed its C-3 reports in 2018, and its 21-Day and 7-Day Pre-General Election C-4 reports, the failure to timely file a small number of contribution and expenditure reports does not amount to a material violation warranting further investigation.

Pursuant to WAC 390-37-060(1) WRRP-PAC will receive a formal written warning concerning the failure to comply with the reporting requirements for to timely file 21- and 7-day Pre-Primary Summary Full Campaign Contributions and Expenditure reports (C-4 reports) and Post-primary C-4 reports, and C-3 reports in accordance with RCW 42.17A.235 and .240.

The formal written warning will include staff's expectation WRRP-PAC timely files complete and accurate reports in future years in accordance with PDC laws and rules. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

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 \_\_\_\_\_  
Peter Lavallee  
Executive Director