



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@pdc.wa.gov • Website: www.pdc.wa.gov

November 7, 2018

Delivered electronically to Cris Sippel

Subject: AWSP -- Washington School Principals Legislative Effectiveness Association PAC;
PDC Case 34601

Dear Cris Sippel:

Below is a copy of an electronic letter sent to Glen Morgan concerning the complaint he filed with the Public Disclosure Commission (PDC) against AWSP -- Washington School Principals Legislative Effectiveness Association PAC. As noted below in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in the complaint.

Pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning the Committee's failure to comply with the C-3 and C-4 reporting requirements to timely disclose contributions and expenditures activities, as provided by RCW 42.17A.235. Staff expects the Committee to file timely and complete reports in future years in accordance with PDC laws and rules. The Commission will consider this 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, please contact Kurt Young at (360) 664-8854, toll-free at 1-877-601-2828, or by email at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young
PDC Compliance Officer

s/ _____
Peter Lavalley, Executive Director



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November 7, 2018

Sent electronically to Glen Morgan “glenmorgan89@gmail.com”

Subject: AWSP -- Washington School Principals Legislative Effectiveness Association PAC;
PDC Case 34601

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against AWSP -- Washington School Principals Legislative Effectiveness Association PAC

PDC staff reviewed the allegations listed in the complaint you filed, the statutes, rules and reporting requirements, queried the PDC contribution and expenditure database for AWSP -- Washington School Principals Legislative Effectiveness Association PAC (Committee), reviewed the Committee Registrations (C-1pc reports), Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Committee, and the response to the complaints. Based on staff's review, we found the following:

- The Committee filed an amended C-1pc report on January 9, 2018, selecting the Full Reporting option, and listing Miles Erdly as Treasurer, Roz Thompson as Committee Manager, and Cris Sippel as performing only Ministerial functions.
- The Committee has been registered and filing C-3 and C-4 reports dating back to at least 1996.
- A number of the allegations listed in your complaint concerned contribution and expenditure information that was disclosed on amended C-3 and C-4 reports filed by the Committee. The Committee stated “Please note: when reports are amended, C3 and C4, the date of amendment is the “received date” and will override the original posting date. Per PDC guidelines, reporters are allowed to amend any report at any time if there is an inaccuracy in data.”
- The Committee acknowledged filing several C-4 reports late but noted that their analysis of indicated “that the delinquency is due to human error, there is nothing “willful” or malicious” or intentional in reporting. We will tighten up internal procedures to guarantee these errors will not happen again.”
- Staff noted that several of the late filed reports contained minimal contribution and expenditure activities.

- The late filed C-4 reports included: (1) the 2017 7-Day Pre-Primary C-4 report that was filed 34 days late disclosing no expenditures and \$195 in total contributions; and (2) the 2015 7-Day Pre-Primary C-4 report that was filed 15 days late but disclosed no contribution or expenditure activities.

As noted above, staff's review determined the Committee failed to timely file a small number of C-3 and C-4 reports covering minor contribution or expenditure activities, but those late filed report does not warrant further investigation.

Pursuant to WAC to WAC 390-37-060(1) the Committee will receive a formal written warning concerning the failure to comply with the reporting requirements to timely file reports of contribution and expenditure activities, as provided by RCW 42.17A.235. The formal written warning will include staff's expectation that the Committee will file timely, accurate and complete C-3 and C-4 reports for the remainder of the 2018 and in any 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, PDC staff is dismissing the allegations concerning the late filed C-3 and C-4 reports and the amended C-3 and C-4 reports in accordance with RCW 42.17A.755(1). In addition, PDC staff dismissed the allegations listed in your complaints 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.

If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young
PDC Compliance Officer

s/ _____
Peter Lavallee, Executive Director

cc: AWSP -- Washington School Principals Legislative Effectiveness Association PAC