



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 13, 2018

Delivered electronically to Danielle Franco-Malone

Subject: Washington and Northern Idaho District Council of Laborers PAC, PDC Case 34605

Dear Ms. Franco-Malone:

Below is a copy of an electronic letter sent to Glen Morgan concerning the complaint he filed with the Public Disclosure Commission (PDC) against your client, the Washington and Northern Idaho District Council of Laborers PAC. As noted below in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation or taking further enforcement action in this matter.

Based on PDC staff's review, the PDC has dismissed the allegation listed in the complaint 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/ _____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director





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November 13, 2018

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

Subject: Washington and Northern Idaho District Council of Laborers PAC, PDC Case 34605

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 11, 2018 against Washington and Northern Idaho District Council of Laborers PAC. The complaint alleged that the Washington and Northern Idaho District Council of Laborers PAC may have violated RCW 42.17A by failing to report legal fees for services incurred by the law firm Schwerin Campbell Barnard Iglitzin & Lavitt, LLP.

PDC staff reviewed the allegation listed in the complaint you filed, the statutes, rules and reporting requirements, reviewed the Summary Full Campaign Contribution and Expenditure reports (C-4 reports), filed by Washington and Northern Idaho District Council of Laborers PAC (Committee), and the response to the complaint provided by Danielle Franco-Malone, an attorney with Schwerin Campbell Barnard Iglitzin & Lavitt, LLP, on behalf of the Committee. Based on staff’s review, we found the following:

- On January 19, 2018, the Committee filed a New Committee Registration (C-1pc report) as a Continuing Other Political Committee, selecting the Full Reporting Option, listing Jermaine Smiley as Treasurer and Bonnie Bautz as performing only Ministerial Functions. The Committee has been registered and reporting as a continuing political committee since July 2, 2013.
- A Stipulation and Agreed Judgment dated September 22, 2017, and signed by Ms. Franco-Malone and Linda Dalton, a Senior Assistant Attorney General on behalf of the State of Washington, was submitted as part of the complaint, in which the Committee acknowledged violations of RCW 42.17A and agreeing to pay a monetary civil penalty, including investigation costs and attorney fees.
- On June 6, 2018, the Committee filed amended C-4 reports covering the period of May 1, 2017 through April 30, 2018, disclosing “Legal Expenses” as a debt owed to the Washington and Northern Idaho District Council of Laborers Union.
- The initial debt of \$110 owed to the Washington and Northern Idaho District Council of Laborers Union for Legal Expenses was incurred on May 31, 2017, and the amount of debt for Legal Expenses increased each month until November 30, 2017, with a total of \$7,863 owed to Washington and Northern Idaho District Council of Laborers Union.

- On June 6, 2018, the Committee filed a “Final report” disclosing \$185,920 in expenditures that included a \$7,863 expenditure paid to the Washington and Northern Idaho District Council of Laborers Union for “Legal Expenses” and a \$176,315 transfer to the Washington and Northern Idaho District Council of Laborers Union to close the account.
- On October 5, 2018, Ms. Franco-Malone sent a letter to the PDC stating that the Committee “made the decision to cease operating and no longer existing” and referred to the final report filed on June 6, 2018.

PDC staff found no evidence of a material violation that would require conducting a more formal investigation into your complaint or pursuing enforcement action in this instance.

Based on this information, and the fact that the Washington and Northern Idaho District Council of Laborers PAC has ceased operations and filed a final report, PDC staff is dismissing this matter in accordance with RCW 42.17A.755(1).

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/ _____
BG Sandahl, Deputy Director
For Peter Lavallee, Executive Director

cc: Danielle Franco-Malone

