



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

July 24, 2017

Delivered electronically to "phil@seattlecfo.com"

Subject: PDC Case Number 17366  
Formal Written Warning

Dear King County Working Families PAC:

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) on April 27, 2017. The complaint alleged that the King County Working Families PAC may have violated Chapter 42.17A RCW for misrepresentation of incumbency, exceeding contribution limits, and failing to timely and accurately report expenditures, contributions, and committee officer information.

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

However, staff has concluded that your actions of failing to timely and accurately report debt for Project Accounting in violation of RCW 42.17A.235, as well as failure to adequately breakdown purpose statements for expenditures with sub-vendors and numbers of mailings in violation of WAC 390-16-037, appear to constitute minor or technical violations as described in WAC 390-37-061.

In accordance with WAC 390-73-060(1)(b), this letter constitutes a Formal Written Warning to accurately and completely list debts and obligations on the Schedule B of the C-4 report, and provide detailed breakdowns of expenditures as provided by WAC 390-16-037. If there are future violations of PDC laws or rules, the Commission will consider this Formal Written Warning in deciding on further Commission action.

If you have questions, you may respond to the email to which this letter is attached, or contact Fox Blackhorn at 1-360-753-1980 or [fox.blackhorn@pdcc.wa.gov](mailto:fox.blackhorn@pdcc.wa.gov).

Sincerely,

Peter Lavalley  
Executive Director

Enclosure: Letter to Glen Morgan



**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)**

July 24, 2017

Delivered electronically to "glenmorgan89@gmail.com"

Subject: Complaint regarding King County Working Families PAC, PDC Case 17366

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on April 27, 2017. Your complaint alleged that that the King County Working Families PAC may have violated Chapter 42.17A RCW for misrepresentation of incumbency, exceeding contribution limits, and failing to timely and accurately report expenditures, contributions, and committee officer information.

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

- King County Working Families PAC failed to accurately report debts, such as for Project Accounting in violation of RCW 42.17A.235, as well as failed to provide detailed breakdowns of sub-vendors and numbers of mailings in violation of WAC 390-16-037.
- King County Working Families PAC accurately reported most debts, but acknowledged the oversight in relation to Project Accounting, as well as their failure to breakdown sub-vendors.

Based on these initial findings, staff has determined that in this instance, failure to accurately report the debt to Project Accounting, and failure to provide sufficient detail in reports of expenditures, does not amount to a material violation warranting further investigation. Pursuant to WAC 390-37-060(1)(b), King County Working Families PAC will receive a formal written warning concerning the above listed issues. The formal written warning will include staff's expectation that King County Working Families accurately and completely list debts and obligations on the Schedule B of the C-4 report, and provide detailed breakdowns of expenditures as provided by WAC 390-16-037. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

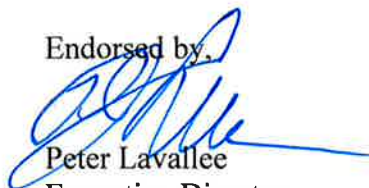
If you have questions, you may contact Fox Blackhorn at 1-360-753-1980, toll-free at 1-877-601-2828, or by e-mail at [fox.blackhorn@pdc.wa.gov](mailto:fox.blackhorn@pdc.wa.gov).

Sincerely,



Fox Blackhorn  
Compliance Coordinator

Endorsed by,



Peter Lavallee  
Executive Director

cc: King County Working Families PAC