

Respondent Name

Whatcom County Democratic Party Central Committee

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#)

(Wed, 29 Dec 2021 at 2:47 PM)

To whom it may concern,

It has come to my attention that the Whatcom County Democratic Central Committee has once again violated Washington State's campaign finance laws (**RCW 42.17A**). The violations are as follows:

1) Acceptance of illegal overlimit corporate contributions multiple years in a row (Violation of RCW 42.17A.405(7), WAC 390-05-400)

It appears that the Whatcom County Democratic Central Committee have committed multiple significant violations of accepting illegal overlimit corporate contributions multiple years in a row. I feel a bit sloppy in filing this complaint so late as I should have noticed the first significant violation a year ago, but better late than never. Lawbreaking should be exposed when it is discovered, and there is no better time than right now.

First, for background, Washington State's campaign finance laws clearly set limits on corporate contributions to non-exempt County Party accounts. See **RCW 42.17A.405(7)** and the corresponding **WAC 390-05-400** which establish this limitation of \$5500. In addition the PDC provides a handy cheat-sheet for simple reference which also defines this limit (see attached). The Whatcom County Democrats are a well-financed Democratic Party PAC which is very familiar with the law, yet chose to violate the law regardless.

The first obvious violation of this contribution limit was a \$25,000 contribution by the Lummi Indian Business Council on September 19, 2020 (**See attached PDC Report #100999599**). This was an illegal contribution under **RCW 42.17A.405(7)** and **WAC 390-05-400** by \$19,500 and these illegal funds should be refunded to the corporation that sent them.

The second obvious violation of this contribution limit was a \$10,000 contribution, also from the Lummi Indian Business Council on October 21, 2021 (**See attached PDC Report #110057097**). This, again was an illegal contribution in violation of **RCW 42.17A.405(7)** and **WAC 390-05-400** by \$4,500 and these illegal funds should also be refunded to the corporation that originally sent them to this county political party PAC illegally.

Please note that the Whatcom County Democratic Party claims to have an "Exempt" account, sponsored by the Lummi Tribe, but the clear reporting shows these funds being used in the Non-Exempt Whatcom County Democratic Party account. Please note, as the PDC has clearly instructed other political Party organizations in the past, it is not legal for the political party to pretend they have an "Exempt" account, but then co-mingle the funds from both the Non-Exempt and Exempt accounts. A separate bank account is required, and the PDC investigators should request bank statements from the Whatcom County Democrats to verify this illegal co-mingling of funds that has so clearly occurred in this case.

History of Breaking the Law

Please note that the Whatcom County Democratic Party has a history of violating Washington State's campaign finance laws, so these recent violations documented above are simply a continuation of this

same law-breaking behavior. Please note that the Public Disclosure Commission has already issued a formal warning to the Whatcom County Democrats on May 16, 2019 (**PDC Enforcement Case #26305**). I have attached a copy of that PDC warning letter for reference. It appears that PDC warning letters are not taken seriously by this well-funded corporately sponsored political organization, and more serious penalties are in order in this instance.

Please feel free to contact me if you need any further evidence of wrongdoing by the Whatcom County Democratic Central Committee PAC, and I'll try to be more timely in my future complaints exposing these inevitable future violations.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to know if a large, mega corporation is purchasing illegal control and influence over a local political party. The public has a right to know when a political party - like the Whatcom County Democrats - are violating the law and flaunting their illegal violations in the belief they are untouchable and don't need to follow the law. The public has a right to know when a political PAC like the Whatcom County Democrats have a long track record of legal violations, yet continue to violate the law regardless.

List of attached evidence or contact information where evidence may be found

Both C3s are attached. The PDC warning letter from 2019 for previous lawbreaking by this corporately-sponsored PAC is attached. The PDC reference document which was ignored by this PAC is also attached. The only way the PDC could see the bank statements (without spoliation or modification) would be if they obtain these through a court order (which is allowed in statute)

List of potential witnesses

All officers of this organization should be interviewed, including the treasurer and a possibly previous corporate officers who decided breaking the law was a good idea.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



CONTRIBUTION LIMITS

CONTRIBUTORS

RECIPIENTS

	State Party	County and LD Party Committees (Jointly)	Caucus Political Committee	Candidate Committees	Pacs, Unions, Corps and other entities		Individuals
State Party	Not Applicable	No Limit	No Limit	Only from Surplus Funds No Limit	\$5,500 per calendar year (non-exempt)	No Limit (exempt)	No Limit
County or LD Party Committee	No Limit	No Limit	No Limit	Only from Surplus Funds No Limit	\$5,500 per calendar year (non-exempt)	No Limit (exempt)	No Limit
Caucus Political Committee	No Limit	No Limit	No Limit	Only from Surplus Funds No Limit	\$1,000 per calendar year		No Limit
State Executive Candidate	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$2,000 per election		\$2,000 per election
Legislative Candidate	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
Judicial Candidate	\$2,000 per election	\$2,000 per election	\$2,000 per election	Prohibited	\$2,000 per election		\$2,000 per election
LOCAL OFFICES: <ul style="list-style-type: none"> • County Office • Mayor • City Council • School Board 	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
King Co Hospital Dists 1 & 2 and Snohomish Co Hosp Dist 2	\$0.95 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$1,000 per election		\$1,000 per election
Port Commissioner Candidates*	\$1.00 per Reg. Voter per cycle	\$0.50 per Reg. Voter per cycle	\$1.00 per Reg. Voter per cycle	Prohibited	\$2,000 per election		\$2,000 per election
PACS	No Limit	No Limit	No Limit	Prohibited	No Limit		No Limit

- **Per cycle** means aggregate during the period from January 1 after the date of the previous general election for the office through December 31 after the upcoming general election for the office.
- **Per election** means per each primary, general, or special election for that office.
- **Per calendar year** means aggregate during the period from January 1 through December 31 each year.
- Contributions designated for the exempt account of a bona fide political party are NOT subject to limit, except **during the 21 days before the general election** when the \$5,000 maximum applies. See next column.
- **During the 21 days before the general election**, no contributor may donate over \$50,000 in the aggregate to a candidate for statewide office, or over \$5,000 in the aggregate to a candidate for any other office or to a political committee. This

includes contributions to a party committee, as well as a candidate's personal contributions to his/her own campaign. It does not apply to contributions from the state committee of the WA State Democratic, Republican or Libertarian Party or from a minor party.

The state law prohibiting campaigns from receiving contributions of more than \$5,000 within 21 days of a general election no longer applies to ballot measure committees, pursuant to the federal court ruling in *Family PAC v. McKenna et al.*, 9th Circuit Court of Appeals No. 10-35832 (Dec. 29, 2011). The statute is RCW 42.17A.420 (former RCW 42.17.105(8)).

*limits applied only to port districts with more than 200,000 registered voters prior to July 28, 2019

Contribution Limits to Candidates Subject to Limits

A candidate subject to limits is prohibited from accepting aggregate contributions exceeding the following amounts:

Source of Contribution	to State Executive and Port Commissioner* candidates	to Legislative, County Office, Mayor, City Council, or School Director candidates and select Hospital Comm'r candidates**
Individual	\$2,000 ¹	\$1,000 ¹
Union or Business	\$2,000 ¹	\$1,000 ¹
Political Action Committee	\$2,000 ¹	\$1,000 ¹
State Party Central Committee	\$1 per voter ^{2,5}	\$1 per voter ^{2,5}
Legislative District Comm	50¢ per voter ^{3,4,5}	50¢ per voter ^{3,4,5}
County Party Central Comm	50¢ per voter ^{3,4,5}	50¢ per voter ^{3,4,5}
Legislative Caucus Comm	\$1 per voter ^{2,5}	\$1 per voter ^{2,5}
*limits applied only to port districts with more than 200,000 registered voters prior to July 28, 2019		
**only in hospital districts with populations greater than 150,999		

1 This is a per election limit; each primary, general and special election is considered a separate election. This limit does not apply to the candidate using personal funds to give to his or her own campaign. The limit does apply to the candidate's spouse.

To be eligible to receive primary election contributions, a candidate's name must be on the ballot or the candidate has to have filed a write-in declaration for the primary election. A candidate who will **not have a primary election** must refund any contributions received in excess of the general election limit. Refunds must be made within 2 weeks of the election administrator's determination that there will be no primary.

Primary election contributions must be made on or before the date of the primary unless a candidate lost the primary and has debt to retire. Contributors may continue to make contributions to a candidate who loses the primary election and has insufficient funds to pay debts outstanding until the debt is retired or 30 days after the primary, whichever comes first.

General election contributions must be made no later than December 31 of the election year.

During the 21 days before the general election, no candidate for legislative office or local office may contribute to his or her own campaign more than \$5,000 in the aggregate, and no candidate for state executive office or Supreme Court justice may contribute to his or her own campaign more than \$50,000 in the aggregate.

- 2 The limit amount of \$1 times the number of registered voters in the jurisdiction (as of the last general election) is for the entire election cycle. The election cycle is from January 1 after the last election for the office or the start of the candidate's campaign -- whichever is later -- through December 31 of the election year in which election is sought. Contributions must be made no later than December 31 of the election year.
- 3 During the election cycle (defined in #2 above), all county central committees and legislative district committees in the state share a combined limit to each candidate of \$.50 times the number of registered voters statewide as of the last general election. (However, during the 21 days before the general election, neither a county central committee nor a legislative district committee may give a state executive office candidate more than \$50,000 in the aggregate.) Contributions must be made on or before December 31 of the election year.
- 4 A county central and legislative district committee may only contribute to a candidate if voters residing in the city, county or legislative district are entitled to elect the candidate to the office sought. During the election cycle (defined in #2 above), a legislative district committee, in conjunction with all county central committees in that district, share a combined per candidate limit of \$.50 times the number of registered voters in the legislative district as of the last general election. (However, during the 21 days before the general, neither a county central committee nor a legislative district committee may give a city, county or legislative candidate more than \$5,000 in the aggregate.) Contributions must be made on or before December 31 of the election year.
- 5 The limit amount is for the entire election cycle. The election cycle is from January 1 after the last election for the office or the start of the candidate's campaign -- whichever is later -- through December 31 of the year in which election is sought. (However, during the 21 days before the general, a caucus political committee may not give a state executive candidate more than \$50,000 in the aggregate or a city, county or legislative candidate more than \$5,000 in the aggregate.) Contributions must be made on or before December 31 of the election year.

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE
 100999599
 09-18-2020

Candidate or Committee Name (Do not abbreviate. Use full name.)
WHATCOM COUNTY DEMOCRATIC CENTRAL COMMITTEE

Mailing Address
PO BOX 3095

City: **BELLINGHAM, WA** Zip + 4: **98227** Office Sought (candidates): Election Date: **2020**

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
09/18/20	LUMMI INDIAN BUSINESS COUNCIL 2665 KWINA RD BELLINGHAM, WA 98226				\$25,000.00	\$25,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$25,000.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$25,000.00

4. Date of Deposit: **09/18/20**

Treasurer's Daytime Telephone No.: **(360)888-6691**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: **Devlin Sweeney** Date: **09-18-2020**

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

110057097

10-23-2021

Candidate or Committee Name (Do not abbreviate. Use full name.)
WHATCOM COUNTY DEMOCRATIC CENTRAL COMMITTEE

Mailing Address
PO BOX 3095

City: **BELLINGHAM, WA** Zip + 4: **98227** Office Sought (candidates): Election Date: **2021**

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I	G E N	Amount	Aggregate* Total
10/21/21	LUMMI INDIAN BUSINESS COUNCIL 2665 KWINA RD BELLINGHAM, WA 98226				\$10,000.00	\$10,000.00
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$10,000.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$10,000.00

4. Date of Deposit: **10/21/21**

Treasurer's Daytime Telephone No.: **(360)543-3356**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: **Cheyanna Strickland** Date: **10-23-2021**



**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 • Website: www.pdc.wa.gov

May 16, 2019

Laura Ewan, legal counsel for Whatcom County Democratic Central Committee

Subject: Complaints filed by Glen Morgan, PDC Case 26305

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) alleging that the Whatcom County Democratic Central Committee (Committee). As noted 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 this matter.

However, pursuant to WAC 390-37-060(1)(b), the Whatcom County District Democratic Central Committee and its current Officers are receiving this formal written warning concerning the Committee's failure to comply with filing requirements to provide: (1) a detailed breakdown for expenditures, including the sub-vendor breakdown for reimbursements to individuals or payments made to consultants or vendors; and (2) a detailed description of the expenditure, including the number of mail pieces or yard signs printed, or station by station listing and run dates for political advertisements, during calendar years 2015, 2016, and 2017.

This formal written warning includes staff's expectation that the Whatcom County District Democratic Central Committee will timely file all future required reports of contributions and expenditures based on the accrual method, not on a cash basis. Staff also expects that the Committee will provide the expenditure details and descriptions as noted in the letter to Mr. Morgan, in addition to the timely disclosure of reportable debts and obligations, as required, in the future. 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 these facts, the PDC has dismissed the allegations listed in the complaint in accordance with RCW 42.17A.755(1). 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 pdc@pdc.wa.gov.

Sincerely,

/s _____
Alice Fiman
Compliance Officer

Endorsed by,
/s _____
Peter Lavalley
Executive Director



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 • Website: www.pdcca.wa.gov

May 16, 2019

Sent Electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Whatcom County Democratic Central Committee, PDC Case 26305

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed September 30, 2017 against the Whatcom County Democratic Central Committee.

Your complaint alleged that the Whatcom County Democratic Central Committee (Committee) may have violated: (1) RCW 42.17A.235 and .240 for failure to accurately and timely file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) and (2) RCW 42.17A.240 for failure to properly report expenditures and debts on C-4 reports, including the failure to provide proper expenditure descriptions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the Committee; and the response of Laura Ewan, legal counsel, for the Committee, submitted to the PDC and the Washington State Attorney General’s Office (AGO), to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- The Whatcom County Democratic Central Committee (Committee) is a Bona Fide Political Party Committee located in Bellingham, Whatcom County, and has been registered and reporting with the PDC dating back to the 1990’s.
- On January 9, 2019, the Committee filed a Committee Registration (C-1pc report) selecting the Full Reporting option and listing Andrew Reding as campaign manager and Sarah Goodin as treasurer.
- The complaint alleged the Committee failed to timely file 26 C-3 and C-4 reports during 2015, 2016 and 2017, and you attached a spreadsheet of those reports, along with alleging that numerous expenditures made by the Committee failed to provide the sub-vendor breakdown or failed to report a debt or obligation for the expenditure.

- Staff's review found that for election years 2015, 2016 and 2017, the Committee filed a total of 900 C-3 and C-4 reports, that included a number of amended reports as follows:
 1. For calendar year 2015, the Committee timely filed its initial C-4 reports for the whole year, which included the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports, and the Post-Primary and Post-General Election C-4 reports, disclosing \$97,085 in contributions received, and \$87,273 in expenditures made. In addition, the Committee timely filed C-3 reports during calendar year 2015, and the majority of the C-3 reports were filed weekly throughout the year other than the reports noted below.
 2. For calendar year 2016, the Committee timely filed its C-4 reports for the whole year, which included the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports, and the Post-Primary and Post-General Election C-4 reports, disclosing \$102,642 in contributions received, and \$94,408 in expenditures made. In addition, the Committee timely filed C-3 reports during calendar year 2016, and the majority of the C-3 reports were filed weekly throughout the year other than the reports noted below.
 3. For calendar year 2017, the Committee timely filed its C-4 reports for the whole year, which included the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports, and the Post-Primary and Post-General Election C-4 reports, disclosing \$153,659 in contributions received, and \$127,667 in expenditures made. In addition, the Committee timely filed C-3 reports during calendar year 2017, and the majority of the C-3 reports were filed weekly throughout the year other than the reports noted below.
- PDC's review found nine of the alleged 26 late filed C-3 or C-4 reports were filed by the Committee as amended C-4 reports, in which the initial C-4 report was timely filed, and the corrections were of minor errors that did not materially impact the public interest.
- The remaining alleged late filed C-3 reports included: (1) six C-3 reports disclosing only bank interest accrued for the period of between \$.09 and \$.33; (2) three C-3 reports that disclosed only one contribution on each report totaling \$10, \$50 and \$100 respectively, which were filed between three to seven days late; (3) one C-3 report totaling \$324 in contribution received from 10 contributors; and (4) five additional C-3 reports filed two to three days late.
- Staff noted that there were a number of expenditures made to individuals as reimbursements as listed in the complaint, for which a more detailed description or explanation of the goods and services provided was required, and in some instances a sub-vendor breakdown was needed as well, especially for the reimbursements made to Ms. Gwen Groden. Staff also noted there appeared to have been expenditures made that likely should have been disclosed on an earlier C-4 report as an outstanding debt or obligation.
- In her response on behalf of Committee, Ms. Ewan stated "Exhibit B alleges violations regarding the failure to report amounts paid for various charges as 'debt' on the C-4 and then presumably a filing of the satisfaction of the 'debt' on the subsequent C-4. For an organization that keeps its books on a cash basis as does the Whatcom County Democrats, such a characterization makes no sense. At its base, this is a dispute with the accounting methods used by the Whatcom County Democrats and, we believe, the overwhelming majority of groups that use a cash basis accounting method, against Mr. Morgan's preference for unnecessary use of time and pixels needed to satisfy his view of proper accounting under the regulations of the PDC."

- Ms. Ewan stated “After receiving the complaint, the Whatcom County Democrats sought guidance on sub-vendor reporting from the PDC...Comparison of the guidance from Mr. [sic] Blackhorn with our reporting of sub-vendor payments is necessary to determine if any violations have occurred. We believe such an examination will show no violation or, at most, a minor violation rather than the string of ‘habitual and willful’ violations alleged by Mr. Morgan. This review is properly within the purview of the administrative duties of the PDC. We note in passing that at least alleged violations 1-20 fall within permissible reporting as we understand Mr. [sic] Blackhorn’s advice.”
- The Committee has one prior PDC violation for PDC Case 06-302 for failing to timely file C-3 and C-4 reports in calendar years 2004 and 2005, in which a stipulated agreement was entered into at a Commission hearing.

As noted above, there were expenditures made by the Committee either as reimbursements to individuals that were Committee officers or volunteers, or payments made to consultants, vendors, or other third parties, for which it appears a more detailed description or explanation of the goods and services provided was required. Those issues are mitigated to a degree by the facts the Committee timely filed the overwhelming majority of the required C-3 and C-4 reports for calendar years 2015, 2016, and 2017, disclosing more than \$353,386 in contributions received and \$309,348 in expenditures made during this timeframe, and no violations have been found since 2006.

However, pursuant to WAC 390-37-060(1)(b), the Whatcom County District Democratic Central Committee will receive a formal written warning concerning the Committee’s failure to comply with filing requirements to provide: (1) a detailed breakdown of expenditures, including the sub-vendor breakdown for reimbursements to individuals or payments made to consultants or vendors; and (2) a detailed description of the expenditure, including the number of mail pieces or yard signs printed, or station by station listing and run dates for political advertisements.

The formal written warning will include staff’s expectation the Whatcom County District Democratic Central Committee timely file all future required reports of contributions and expenditures, including the expenditure details and descriptions listed above, and the timely disclosure of debts and obligations as required in the future. 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 finds that no further action is warranted and 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 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Peter Lavalley
Executive Director