



**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)**

June 29, 2022

Sent electronically to mailpapyan@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Case 107839

Dear Armen Papyan:

Below is a copy of the letter sent to Glen Morgan concerning a complaint filed April 28, 2022 with the Public Disclosure Commission (PDC). The complaint alleged a violation of RCW 42.17A.430 for improper disposal of surplus funds from your 2021 campaign for Tukwila City Council.

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning your improper disposal of surplus funds. This formal written warning comes with staff's expectation you, in the future, properly dispose of campaign funds.

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

If you have questions, contact Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [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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June 29, 2022

Sent electronically to [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Armen Papyan, PDC Case 107839

Dear Glen Morgan:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed April 28, 2022. Your complaint alleged Armen Papyan violated 42.17A.430 by improperly disposing of surplus funds from a 2021 campaign for Tukwila City Council.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the materials provided in the complaint; and the response from Armen Papyan to determine whether the record supports a finding of one or more violations.

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

- Armen Papyan was a 2021 candidate for Tukwila City Council and was not elected to the position.
- In a Full Summary Contributions and Expenditure (C-4) report filed January 5, 2022, Papyan reported three expenditures totaling \$1,300 as "transfer to surplus funds account"; however, Papyan had not established a surplus funds account with the PDC.
- In response to the complaint, Papyan stated the expenditures were categorized incorrectly and were refunded contributions and a loan repayment.
- Papyan had not reported a loan to the campaign, but rather candidate personal funds. Under PDC rules, candidate personal funds cannot be returned to the candidate.
- On June 26, 2022, Papyan filed two C-4 reports, noting the \$500 contributions were refunded to Ara Papyan and Valdimir Mironyu, plus returned the \$300 payment made to himself, as there was no loan agreement on file with the PDC.

Based on these findings, staff has determined that in this instance, the improper disposal of surplus funds does not amount to a finding of a violation that warrants further investigation.

However, pursuant to WAC 390-37-060(1)(d), Armen Papyan will receive a formal written warning concerning the failure to comply with PDC requirements as noted in this letter.

The formal written warning will include staff's expectation Armen Papyan follow PDC regulations for proper disposing of campaign funds as required by law.

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, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

Endorsed by,

/s

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Alice Fiman  
Compliance Officer

/s

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Peter Lavalley  
Executive Director