



**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

November 14, 2018

Delivered electronically to Carl Olson, Treasurer for CKCQE at "kitsapdemocrat52@gmail.com"

Subject: PDC Case 34115

Dear Carl Olson:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Glen 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), this letter serves as a warning concerning your failure to timely file C-3 and C-4 reports. PDC staff expects that you will file timely and complete C-3 and C-4 reports, including submitting prompt amendments when necessary, and that the committee will follow the reporting schedule for the February 12, 2019 special election 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.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____

Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____

Peter Lavallee

Executive Director



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November 14, 2018

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding Central Kitsap Citizens for Quality Education, PDC Case 34115

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 10, 2018. Your complaint alleged that Central Kitsap Citizens for Quality Education (CKCQE) may have violated RCW 42.17A.235, .265, .205, .220, .320, .255 for failure to timely and accurately disclose contributions, expenditures, books of account, committee registration, and sponsor ID.

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

- No evidence was provided to substantiate any allegations outside of late filing of C-3 and C-4 reports in violation of RCW 42.17A.235 and two allegations of late deposits of contributions received in violation of RCW 42.17A.220.

February 9, 2016 Special Election

- The complaint alleged violations of RCW 42.17A.235 for late filing of six C-4 reports, including three original reports and three amendments and twelve C-3 reports, as well as two alleged violations of RCW 42.17A.220 for late deposit of contributions.
- The 21-day pre-election C-4 report disclosed expenditures for a fundraising event and advertisement and was submitted after the day of the election disclosing approximately 56 percent of total expenses.

- The majority of the late-filed C-3 reports disclosed un-itemized or small contributions from payroll deductions of Central Kitsap School District employees. Two reports disclosed late deposits between 1 and 8 days late.

February 12, 2019 Special Election

- The complaint alleged violations of RCW 42.17A.235 for late filing of thirteen C-4 reports, including eleven original reports and two amendments submitted and four C-3 reports.
 - The C-4s were filed between 5 and 107 days late disclosing almost identical deposit and expenditure amounts.
 - The late-filed C-3 reports disclosed un-itemized or small contributions from payroll deductions of Central Kitsap School District employees.
- In his response, Carl Olson, current treasurer for CKCQE, stated that he took over in December 2015 following the death of the committee's previous treasurer. Mr. Olson stated that he has worked with other election campaigns with no compliance issues. In addition, he noted that he has been dealing with personal and family related issues since December 2017.

Pursuant to WAC 390-37-060(1)(b), Central Kitsap Citizens for Quality Education will receive a formal written warning concerning failure to timely file C-3 and C-4 reports. The formal written warning will include staff's expectation that CKCQE files timely C-3 and C-4 reports, including submitting prompt amendments when necessary, and that the committee will follow the reporting schedule for the February 12, 2019 special election 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 these facts, staff has determined that in this instance, failure to timely file C-3 disclosing un-itemized or small contributions and C-4 reports including activity primarily concerning a future election, does not amount to an actual material violation warranting further investigation. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____

Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____

For Peter Lavallee

Executive Director

cc: Central Kitsap Citizens for Quality Education