



**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.pdca.wa.gov](http://www.pdca.wa.gov)**

October 10, 2023

Delivered electronically to Melissa McMahon Do at [melissa4tukwila@gmail.com](mailto:melissa4tukwila@gmail.com)

Subject: Complaint filed by Glen Morgan, PDC Case 140314

Dear Melissa McMahon Do:

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

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, per WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to timely and accurately show expenditures and contributions; and failure to show sponsor ID on a campaign website. Staff expects you to maintain your campaign website per PDC requirements and timely file all required reports of contributions and expenditures throughout the rest of the 2023 campaign as well as in future years. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

If you have questions, you may contact Tanya Mercier at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier  
Compliance Officer

/s/ Electronically signed

Peter Frey Lavallee  
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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

October 10, 2023

Delivered electronically to Glen Morgan at [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint against Melissa McMahon Do, PDC Case 140314

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on July 20, 2023. The complaint alleged that Melissa McMahon Do, a first-time candidate for the City of Tukwila Council, may have violated RCW 42.17A.235, .240 and .320 for failure to timely and accurately show expenditures and contributions; and failure to show sponsor ID on a campaign website.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; the Respondent's data in the PDC contribution and expenditure database; and other relevant information, to decide whether the record supports a finding of one or more violations.

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

- Melissa McMahon Do is a first-time candidate running for council position 4 in the City of Tukwila 2023 election. Because there are only two candidates for this position, Ms. McMahon Do will only appear on the general election ballot.
- Ms. McMahon Do filed a declaration of candidacy on May 19, 2023, followed up by a Candidate Registration (C-1) on May 31, 2023, and Personal Financial Affairs Statement (F-1) on June 1, 2023, for the period 5/19/22 – 5/18/23. The start of her campaign was May 19, 2023.
- PDC staff reviewed the campaign website using a web archiving tool and discovered that as early as July 12, 2023, sponsor identification was missing from the website. Per RCW 42.17A.320, "All written political advertising, ..., shall include the sponsor's name and address." Once contacted, the campaign revised the website and as of August 8, 2023, the site included the required information for sponsor identification.
- The campaign website showed contributions received as of July 12, 2023, for a total of \$322.37 from six contributors. In their response to the complaint, the campaign reported paying out-of-pocket for a filing fee incurred on 5/19/23, having professional pictures for campaign purposes taken on 6/17/23, paying a domain fee, and commissioning campaign

signs from Renton Printery on 6/30/23. Ms. McMahon Do says “the signs were designed entirely by my husband and myself ... the website was developed using Google Sites (a free service) by my husband. It was the intent of the campaign to pay back out-of-pocket costs if fundraising was successful.”

- Per RCW 42.17A.235 a candidate shall file a C-4 report on the tenth of each month if contributions are received or an expenditure is made in the preceding month and the total financial activity exceeds \$750 dollars aggregate. Other than the 21-day and 7-day pre-election reports, reporting may be deferred until the threshold is met. Any time reports are deferred, the campaign must retroactively file reports for the period deferred. The PDC does not consider deferred reports late if they are filed timely once the financial activity threshold is exceeded. Per RCW 42.17A.220 all monetary contributions shall be deposited within five business days of receipt and per .235 a C-3 report showing those contributions is due the Monday following the deposit.
- The first report due from the campaign would have been a C-3 for contribution activity that started in May 2023 and then subsequent C-3s for June and July 2023 contribution activity. The first C-4 would not have been due until contribution and expenditure activity exceeded \$750 which appears to have occurred in July making a monthly C-4 report due on August 10, 2023. The candidate was not on the primary ballot so a 21-day and 7-day C-4 were not due before the primary election. Therefore, the campaign has the following late reporting:
  - C3110167069, due 6/10 filed 8/19
  - C3110167068, due 6/26 filed 8/19
  - C3110167071, due 7/17 filed 8/19
  - C311016702, due 7/17 filed 8/19
  - C3110163762, due 7/24 filed 8/3
  - C4110175615, due 8/10 filed 9/27
  - C4110175703, due 8/10 filed 9/29
  - C4110175615, due 9/11 filed 9/27
- As of October 6, 2023, the campaign reported \$4,905.54 received in contributions of which the candidate lent \$694.42 to their campaign. There was \$1,242.65 reported in expenditures.
- The Respondent does not have other similar warnings or violations of PDC requirements.

This is a campaign formed of the candidate and her husband as Treasurer, and neither has prior campaign management experience. The campaign said in their response to the complaint that the missed reporting of out-of-pocket expenses was an oversight “due to the campaign personnel not realizing that out of pocket expenses needed to be reported. This will be noted moving forward.” The campaign also had a misunderstanding of the timeline for when reports were due and with help from our filer assistance staff, they worked effectively to get their reporting up to date and correct.

Based on our case review, staff has determined that, in this instance, failure to timely show expenditures and contributions; and failure to show sponsor ID on a campaign website does not amount to a finding of a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, Melissa McMahon Do will receive a formal written warning concerning their failure to timely and accurately show expenditures and contributions; and failure to disclose sponsor ID on a campaign website. The formal written warning will include staff's expectation that Ms. McMahon Do maintain their campaign website per PDC requirements and timely file all required reports of contributions and expenditures throughout the rest of the 2023 campaign as well as in future years. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

*/s/ Electronically signed*  
Tanya Mercier  
Compliance Officer

Endorsed by,

*/s/ Electronically signed*  
Peter Frey Lavallee  
Executive Director

cc: Melissa McMahon Do