



**State of Washington**

**PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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November 15, 2023

Delivered electronically to Joann Carlsen with Pierce County Democratic Central Committee

Subject: Complaint filed by Glen Morgan, PDC Complaint 141605

Joann Carlsen,

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint he recently filed with the Public Disclosure Commission (PDC) against the Pierce County Democratic Central Committee.

In accordance with WAC 390-37-060(1)(d), PDC staff is issuing a formal written warning to the Pierce County Democratic Central Committee concerning the requirement to timely and accurately file C-3 and C-4 reports for the remainder of calendar year 2023, and for all future calendar years. The warning to the Committee includes providing the required details and sub-vendor information for expenditures and in-kind contributions, and especially for political advertising such as the number of signs produced or flyers printed. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules.

Finally, just to clarify the threshold for disclosing monetary and in-kind contributor's name and address was raised to \$100, and the "volunteer services" threshold for reporting the value of those goods or services donated was raised to \$200.

PDC staff has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s \_\_\_\_\_  
Electronically Signed Kurt Young  
Compliance Officer

/s \_\_\_\_\_  
Electronically Signed Peter Lavalley, PDC Executive  
Director



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November 15, 2023

Sent electronically to Glen Morgan

Subject: Complaint filed against Committee for the Pierce County Democratic Central Committee, PDC Case 141605

Glen Morgan:

Public Disclosure Commission (PDC) staff has completed its review of the complaint you filed against the Pierce County Democratic Central Committee; a bona fide political party county committee registered with the PDC. The complaint alleged violations of RCW 42.17A.235 and .240 by the Pierce County Democratic Central Committee for failing to timely and accurately file contribution and expenditure reports during calendar years 2018 to the present.

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and the reporting requirements for a continuing political committee; the Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Pierce County Democratic Central Committee (Committee); the email responses from Joann Carlsen, Committee Treasurer; and other relevant information, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- On May 15, 2023, the Committee filed a Committee Registration with the PDC registering as a bona fide political party county committee for 2023, selecting the Full Reporting option, and listing Shelley White as Ministerial Treasurer.
- In the September 9, 2023, response from Ms. Carlsen she stated that contrary to comments made by Mr. Morgan in his complaint, the Committee “is not a prolific law-breaking crew, but rather the Treasurers of the organization are unpaid volunteers, who want to follow the rules and disclose the information both timely and accurately.” However, she noted that during 2018 and 2019, the Committee had “four different Treasurers for the organization which added to the confusion in filings” and some of those individuals did “not have the background or understanding of the report to do the job successfully.”
- Ms. Carlsen stated that “Mr. Morgan’s complaint contains 52 pages, much of which is a restatement of Case #46474, #44695 and #18611 and subsequent lawsuit and settlement which were previously addressed and paid” by the Committee. She stated that it appears his inclusion of this information is being “used to mainly to justify the current complaint.” The complaint included copies of “three specific C4’s and a two-page Excel spreadsheet reflecting what he considers to be significant lawbreaking.”

- Ms. Carlsen stated that the Committee’s response, along with an attached spreadsheet are offered as an explanation to those allegations. She stated that two of the C-4 reports included as part of the complaint concerned the reporting of two in-kind contributions received by the Committee in August of 2021 for food and picnic donations contributed by two volunteers. She stated that the two in-kind contributions, which were for \$150 and \$75 were “required to be reported if the donor has in aggregate spent more than \$200.” (Staff would note that the threshold for listing name and address for contributors is \$100 for monetary and in-kind contributions, and the volunteer services threshold for reporting the value of those goods or services was raised to \$200).
- Ms. Carlsen stated that in both of allegations listed in the complaint for in-kind contributions in these reports, the items donated “were reported because it was felt that by doing so the committee was not hiding any transactions.” She noted that the in-kind contributions disclosed on the 2021 Post Primary General Election C-4 report “were for refreshments or supplies for social events and well under \$200 limit” and were for party building activities and not to support any candidates or ballot propositions. She stated that “because the items did not meet the \$200 limit, it was assumed no detail was necessary.”
- The third in-kind contribution allegation concerned the 2020 7-Day Pre-General Election C-4 report that was timely filed by the Committee on October 26, 2020, and disclosed a \$360 in-kind contribution for “Yard signs” received from the Washington State Democrats. Ms. Carlsen stated that while the contribution was timely filed, the report failed “to include the number of signs received as required by law. The number of signs was 360.”
- Finally, the three remaining in-kind contribution allegations concerned the 2022 November C-4 report that was timely filed by the Committee on December 4, 2022, and disclosed three in-kind contributions from three different individuals totaling \$116.60. The \$116.60 total for the three in-kind contributions all for a 2020 auction event and included \$46.60 for “Paper products”; \$40 for “Food”; and \$30 for “Drinks.”
- Ms. Carlsen attached an Excel spreadsheet along with the Committee’s response, that was copied from the original complaint spreadsheet submitted by Mr. Morgan, and she added a column so she could provide comments or a reply for all the “alleged late filed reports.” She stated that the spreadsheet was divided into two sections and is summarized by PDC staff below.
- Staff would note that the summary below excludes 15 amended C-3 and C-4 reports that were included in your initial spreadsheet, and as noted in earlier correspondence from PDC Deputy Director Kim Bradford to you, merely identifying an amended C-3 or C-4 report in a spreadsheet as being filed late without describing the underlying changes on the amended report, or identifying what information was omitted from the initial report, would not be considered a violation.
  1. One section involved the Pierce County Democratic Party, which was a dormant Committee account that had been closed out prior to 2018, but the previous Treasurers had not filed the “Final reports” disposing of the remaining funds. Ms. Carlsen stated the five C-4 reports for the dormant account were filed late, and did not get filed until February 9, 2020, covering the period July 31-December 31, 2018. But she noted only three of the five C-4 reports reported any activities, none of which had any nexus to the 2018 election cycle, and the three reports disclosed \$188.47 in combined contribution and expenditure activities.
  2. One section involved the Pierce County Democratic Central Committee, which was the bona fide political party committee that filed reports from 2018 to present.

The sheet includes a response for all the “alleged late filed” C-3 and C-4 reports by year and included:

- (a) **CY 2023:** One C-4 report was filed 21 days late and listed \$64.78 in activity items. The report was filed late since the Treasurer submitted a July 2023 monthly C-4 report but the Committee had endorsed a candidate which required the filing of the 7-Day Pre-General Election C-4 report.
- (b) **CY 2022:** Six C-3 reports were filed between one to nine days late disclosing a combined \$85.14 in total contributions received.
- (c) **CY 2021:** One C-4 report, the 21-Day Pre-Primary Election C-4 report was filed one day late disclosing \$723.31 in Committee contribution and expenditure activities.
- (d) **CY 2020:** Once C-3 report was filed 20 days late on March 1, 2020, disclosing \$29 in contributions received and was found during a review of the bank statements.
- (e) **CY 2019:** Five C-3 reports were filed three to 34 days late, disclosing a combined \$280.08 in total contributions received; one C-3 report was filed 356 days late but was blank; and one C-4 report was filed two days late but disclosed no contribution or expenditure activity.
- (f) **CY 2018:** One C-3 report was filed 99 days stating in the comment’s column: “Low-cost fund raiser deposit (\$863.00) missed. Found in review of bank account after Treasurer resigned.”

Based on these findings, PDC staff found no evidence of violations that would require conducting a more formal investigation into the complaint or pursuing any further enforcement action in this instance.

In accordance with WAC 390-37-060(1)(d), however, PDC staff is issuing a formal written warning to the Pierce County Democratic Central Committee concerning the requirement to timely and accurately file C-3 and C-4 reports for the remainder of calendar year 2023, and for all future calendar years. The warning includes providing the required details for expenditures and in-kind contributions, such as the number of signs produced or flyers printers. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s/  
Electronically Signed Kurt Young  
Compliance Officer

/s/  
Electronically Signed Peter Lavalley, PDC Executive  
Director



cc: Pierce County Democratic Central Committee