



**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)**

November 20, 2023

Delivered electronically to Campaign for Tribal Self-Reliance, Sponsored by the Washington Indian Gaming Association PAC at [rebecca@washingtonindiangaming.org](mailto:rebecca@washingtonindiangaming.org)

Subject: Complaint filed by Glen Morgan, PDC Case 141842

Dear Campaign for Tribal Self-Reliance:

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 follow filing requirements for RCW 42.17A.235 and .240 in years 2019 through 2023 as noted in the enclosed letter sent to Mr. Morgan. Staff expects you to file all required reports of contributions and expenditures in future years timely and accurately. 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 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



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November 20, 2023

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

Subject: Complaint to Campaign for Tribal Self-Reliance, Sponsored by the Washington Indian Gaming Association PAC, PDC Case 141842

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on August 25, 2023. The complaint alleged that Campaign for Tribal Self-Reliance, sponsored by the Washington Indian Gaming Association PAC (the Committee), a continuing political committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures on reports in election years 2018 to 2023.

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; 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:

- The Committee last filed a Political Committee Registration (C-1PC report) on August 6, 2020, under the Full Reporting option. The Committee, formerly identified as Committee for Tribal Self Reliance or Campaign for Tribal Self Reliance by Washington Indian Gaming Association, was registered and reporting as a continuing political committee dating back to at least 2008.
- Per RCW 42.17A.235 and .240, under the Full Reporting Option, the Committee was required to disclose contribution and expenditure information by submitting Receipts and Expenditure Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3) reports to the PDC. The Committee's due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.

- Specific to reporting for 2018, the alleged violations are beyond the statute of limitations. Per RCW 42.17A.770, action must be started within five years after the date when the alleged violation occurred.
- Amendments are insufficient evidence of late reporting. There are many reasons a committee might amend their reports and the mere presence of an amendment is not itself conclusive evidence of a violation. When considering C-3 and C-4s, these report amendments require inspection of the actual report to determine whether the committee has a requirement to report activity by a given date. As well, deciding if a report is late is not as simple as calculating the days late based on a periodic reporting timeline and when a report was filed but is fact specific to the campaign and its activities.
- Of the non-amended reports due in 2019, 2020, 2021, 2022 and 2023, outlined in the evidence provided, there were seven C-3 and four C-4 reports that showed a level of late-reported activity that would have deprived the public of critical information. This is particularly important since the Committee did participate in elections during the years 2019 through 2023. A mitigating factor in this case is that some of the funds reported are refunds to the sponsoring agent Washington Indian Gaming Association.
- In response to the complaint, the Committee states, “We will do better in the future and will institute processes to improve our timeliness. I have taken the PDC training courses and will be sure to continue to do so, as well as have other staff attend. I also will continue to engage with our outside firm on best practices for filing.”
- The Committee has no other similar complaints or violations on record.

Based on our findings staff has determined that, in this instance, Campaign for Tribal Self-Reliance, sponsored by the Washington Indian Gaming Association PAC’s failure to timely and accurately disclose contributions and expenditures on reports in election years 2019 to 2023 does not amount to a finding of a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, Campaign for Tribal Self-Reliance, sponsored by the Washington Indian Gaming Association PAC, will receive a formal written warning concerning their failure to follow filing requirements for RCW 42.17A.235 and .240 when reporting in years 2019 to 2023. Staff expects the Committee to file all required reports of contributions and expenditures in future years timely and accurately. 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 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 Lavalley  
Executive Director

cc: Campaign for Tribal Self-Reliance, Sponsored by the Washington Indian Gaming Association PAC