



**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 14, 2023

Delivered electronically to Washington Political Action for Candidate Election PAC (PACE – NASW WA) at [jarp.naswwa@socialworkers.org](mailto:jarp.naswwa@socialworkers.org)

Subject: Complaint filed by Glen Morgan, PDC Case 141855

Dear PACE – NASW WA PAC:

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 2022 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 14, 2023

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

Subject: Complaint against Washington Political Action for Candidate Election PAC (PACE – NASW WA), PDC Case 141855

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on August 23, 2023. The complaint alleged that Washington Political Action for Candidate Election PAC (PACE – NASW WA), 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:

- PACE – NASW WA (the Committee) filed a Political Committee Registration (C-1PC report) on January 25, 2023, under the Full Reporting option. The Committee 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. In this instance, the evidence provided was insufficient to support the allegations of late or inaccurate reporting for the identified amended reports for years 2020, 2021, and 2022.
- Of the non-amended reports due in 2019, 2020, 2021, 2022 and 2023, outlined in the evidence provided, only one report showed a level of late-reported activity that would have deprived the public of critical information.
  - C-4 #100999531, for election year 2020, identifies a \$345 expenditure for bookkeeping and \$1350 in expenditures for campaign contributions to candidates.
  - In their response to the complaint, the Committee identified reporting issues experienced in 2018 and 2019 that caused their electronic reporting in the Online Reporting of Candidate Activity (ORCA) system to be filed in 2020. For 2022 the Committee has had substantial compliance and in 2023 the C-3 and C-4 reports have been filed timely on a monthly basis. The Committee does not appear to have participated in the 2023 election.
- A mitigating factor of the late reporting was that in 2020 the Committee discovered that the accounting firm hired to assist with filing reports did not accurately file reports for 2018 and 2019. The Committee worked with their accountants and PDC staff to refile in the ORCA system reports originally filed in paper format. Committee staff responsible for PDC reporting also experienced significant difficulty with reporting because they were using multiple computers with the PDC reporting software causing reconciliation issues with program data stored on multiple computers.
- The Committee has no other similar complaints or violations on record.

Based on our findings staff has decided that, in this instance, PACE – NASW WA’s failure to timely and accurately disclose contributions and expenditures on reports in election years 2019 to 2022 does not amount to a finding of a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, PACE – NASW WA 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, 2020, 2021 and 2022. Staff expects PACE – NASW WA 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: Washington Political Action for Candidate Election PAC (PACE – NASW WA)