



State of Washington  
PUBLIC DISCLOSURE COMMISSION

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November 21, 2023

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

Subject: Complaint regarding the Jackson Legacy Fund, PDC Case 141992

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 27, 2023. The complaint alleged that Jackson Legacy Fund, a political action committee registered with the Public Disclosure Commission (PDC) since 2010, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file Summary, Full Report Receipts and Expenditures (C-4) reports in 2019 – 2023, and failure to list “Top 5” donors on its website pursuant to RCW 42.17A.320.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegations listed in the complaint; the applicable statute(s), rule(s), and reporting requirements; the Cash Receipts Monetary Contributions (C-3) and Summary, Full Report Receipts and Expenditures C-4 reports filed by the Jackson Legacy Fund (Committee) in 2019 – 2023; the Committee’s website; the response to the complaint provided by Reanne Robertson, Treasurer, on behalf of the Committee; 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 October 10, 2023, the Committee submitted its updated Committee Registration (C-1pc), selecting the Full Reporting Option and listing Reanne Robertson and Philip Lloyd as Bookkeeper and Ministerial Treasurer, respectively. The Committee filed its first/initial Committee Registration (C-1pc) with the PDC in 2010.
- You alleged that the Committee failed to timely and accurately file contribution and expenditure (C-4) reports. Specifically, you included seven attachments/links (five C-4 reports, one Excel spreadsheet and one pdf-copy of the Excel spreadsheet (showing “illegally late reporting”)), as evidence of the alleged transgressions by the Committee. You also alleged that the Committee failed to “properly identify top donors” on its website.
- Staff reviewed the statutory C-4 reports filed by the Committee during the time periods at issue in the complaint and noted that there were some discrepancies in the carry-forward amounts as noted in the complaint from 2019 to 2020, 2021 to 2022 and 2022 to 2023. Staff also noted that there were some late

reports in the Excel spreadsheet you submitted with the complaint. Out of the 51 alleged late reports in the spreadsheet, 13 were amended reports which were originally filed timely and correctly. Fifteen reports were filed between 1 and 4 days late while five reports were filed between five and 11 days late. Lastly, 13 of the reports had zero activity during the time period that they were required to be filed.

- In its response to the complaint, by way of Reanne Robertson, Treasurer, the Committee stated: “The complaint speculates that campaign funds have ‘disappeared’ as a result of ‘potential theft.’ This allegation is baseless and offensive. This concerns a simple accounting issue related to the final report of one calendar year and the initial report of the next, which has been addressed. The Treasurer has consulted with a PDC filing specialist to amend reports. In early 2023, the Treasurer sought the guidance of the PDC to amend the final report for 2022 to include a contribution postmarked the previous year but delayed in transit until after the filing of the first report of the new year. No new correction was necessary to account for \$44 in interest payment in 2019.” Regarding the allegations of delayed reporting, the Committee stated: “The Treasurer identified fourteen items the complaint has marked as ‘late,’ which, in fact, refer to *amended* reports, not *original* filing dates. There are serious accuracy issues with the spreadsheet provided by the complainant. Given the length of the complainant’s submission, the fact that it appears based on estimates (‘projected due date’), and that it requires line-by-line verification, the Treasurer has not been able to do a comprehensive verification . . . . The Treasurer regrets not observing the change to the C3 reporting schedule beginning the first of June and the delay in filing #110159281 at the same time as the C4. These delays were inadvertent and have been addressed going forward . . . . The Committee regrets instances where reports were delayed but respectfully submits that the underlying facts here do not support the complaint’s inflammatory allegations.”
- Lastly, regarding the allegation regarding the Committee’s “Top 5” contributors not being depicted on the Committee’s website, staff noted that Committee’s website depicts the sponsor’s name and address, and therefore meets the identification requirements pursuant to WAC 390-18-010. In its response to this allegation, the Committee stated: “To the committee’s knowledge, identification requirements, including organization’s website, are set out in WAC 390-18-010. As to organization websites, WAC 390-18-010(5) provides: ‘Political committee websites and other online forums created by a political committee must include sponsor identification.’ By clearly disclosing the sponsor’s name and address, the committee website complies with WAC 390-18-010 (5). WAC 390-18-010 draws a distinction between committee websites and political advertising, including advertising undertaken as an independent expenditure or electioneering communication. The latter requires ‘top five’ contributor disclosure. The former does not.”

Based on these findings staff has determined that, in this instance, the Committee’s failure to timely and accurately file a few reports between 2019 and 2023 election years, does not amount to a violation that warrants further investigation.

However, pursuant to WAC 390-37-060(1)(d), the Committee will receive a formal written warning concerning its failure to accurately and timely disclose contribution and expenditure reports. The formal warning will include staff’s expectation that Jackson Legacy Fund adhere to the statutory requirements for reporting contribution and expenditure reports, in future years. Additionally, Jackson Legacy Fund will be informed that the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Accordingly, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, 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/\_\_\_\_\_  
Erick O. Agina, Compliance Officer

s/\_\_\_\_\_  
Peter Frey Lavalley, Executive Director

cc: Jackson Legacy Fund

