



**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 • Website: www.pdc.wa.gov

November 11, 2018

Delivered electronically to Jay Petterson, Treasurer for WACA PAC at "info@wacannabusiness.org"

Subject: PDC Case 34113

Dear Jay Petterson:

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

As noted below to Glen Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning your failure to timely file C-4 reports. PDC staff expects that you will file timely and complete C-4 reports, including amending quickly when necessary, in future years in accordance with PDC laws and rules. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____
Peter Lavalley
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 • Website: www.pdc.wa.gov

November 11, 2018

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding Washington Cannabusiness Association PAC, PDC Case 34113

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 10, 2018. Your complaint alleged that Washington Cannabusiness Association PAC (WACA PAC) may have violated RCW 42.17A.235, .265, .205, .220, .320, .255 for failure to timely and accurately disclose contributions, expenditures, books of account, committee registration, and sponsor ID.

PDC staff reviewed your allegations, and as a result of staff’s review, we found the following:

- No evidence was provided to substantiate any allegations outside of late filing of C-4 reports in violation of RCW 42.17A.235.
- The complaint alleged violations of RCW 42.17A.235 for late filing of twelve C-4 reports, including two original reports and ten amendments. The majority of the alleged violations were for C-4 reports that were voluntarily filed, amended to remove previously disclosed expenditures, and C-4 reports disclosing \$0 in new activity.
- The Washington Cannabusiness Association PAC filed one amended C-4 report on October 18, 2018 that included \$3,070.48 in previously undisclosed expenditures, including contributions made to caucus committees. The amended C-4 reports were added to the 7-day pre-primary C-4 due July 26, 2016.
- In his response, Jay Petterson, treasurer for WACA PAC, stated that he believed amending a report would not constitute a late filing by PDC staff and that the committee has worked hard to be open and comply with all applicable legal requirements.

Pursuant to WAC 390-37-060(1)(b), Washington Cannabusiness Association PAC will receive a formal written warning concerning failure to timely file C-4 reports. The formal written warning will include staff's expectation that Washington Cannabusiness Association PAC files timely and complete C-4 reports, including amending quickly when necessary, in future years in accordance with PDC laws and rules. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on these facts, staff has determined that in this instance, failure to timely file a small number of C-4 reports covering minor activity, does not amount to an actual material violation warranting further investigation. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____

Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____

For Peter Lavalley
Executive Director

cc: Washington Cannabusiness Association PAC