



**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: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

February 1, 2024

Delivered electronically to Kathleen Martin at “katemartinseattle@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 144505

Dear Kathleen Martin:

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 in accordance with 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, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. Staff expects you to timely and accurately file all required reports of contributions and expenditures in future years. The Commission will consider this 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 at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by,

*Electronically signed*

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Jennifer Hansen  
Compliance Officer

*Electronically signed*

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Peter Frey Lavalley  
Executive Director



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February 1, 2024

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

Subject: Complaint regarding Kathleen Martin, PDC Case 144505

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 26, 2023. The complaint alleged that Kathleen Martin, a candidate for Seattle City Council, Position 6 in the 2019 election, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing expenditures undertaken by the Campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and the Respondent’s data in the PDC contribution and expenditure database; 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 2, 2019, Kathleen Martin submitted a Candidate Registration Statement (C-1 report) declaring her candidacy for Seattle City Council, Position 6 in the 2019 election, selecting the “Full Reporting” option and listing herself as Treasurer and only officer.
- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions, in-kind donations of goods or services, and expenditures made by the campaign.
- RCW 42.17A.240 describes the required content of each campaign reports including the name and address of each person making contributions and to whom an expenditure was made.
- The complaint alleged that the 2019 Martin Campaign had submitted an inaccurate May 2019 C-4 report disclosing a spurious expenditure amount resulting in a negative cash on hand balance.
- The Martin Campaign filed the C-4 report covering May 1 to 31, 2019, early on May 1, 2019, disclosing \$120 in total contributions and zero expenditures.
- The May 2019 C-4 was amended on June 11, 2019, one day after the original required due date of June 10, 2019, and disclosed \$3,834.87 in total contributions and \$5,066,648.41 in total expenditures, specifically including a \$5,062,019 expenditure to La Conasupo for food at a campaign event. The C-4 was amended again on June 11, 2019, to correct the dollar amount paid to vendor La Conasupo to \$20 and corrected the resulting negative cash on hand balance caused from the data entry error.
- In her response, Ms. Martin pointed to the amendment that had been made to correct the expenditure error prior to the complaint, believing that it had just been overlooked.

- Ms. Martin lost in the primary election.

It appears that the expenditure error disclosed on the initial submission of the May 2019 C-4 report late reporting was a data entry error as supported by the amendment submitted later the same day. Although staff found that the accurate report was submitted one day late, the correction was available several weeks prior to the 2019 primary election. Staff found no evidence that the reporting error was intentionally made to conceal campaign activity from the public.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file the May 2019 C-4 report for the 2019 Kathleen Martin Campaign does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Kathleen Martin will receive a formal written warning concerning failure to timely and accurately disclose expenditures for her 2019 Campaign. The formal written warning will include staff's expectation that Ms. Martin timely and accurately files all future required reports of contributions and expenditures. 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 this information, 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

*Electronically signed*

\_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

*Electronically signed*

\_\_\_\_\_  
Peter Frey Lavalley  
Executive Director

cc: Kathleen Martin