



**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)**

April 18, 2024

Delivered electronically to Evan Merritt at “[evanmerritt73@yahoo.com](mailto:evanmerritt73@yahoo.com)”

Subject: Complaint filed by Glen Morgan, PDC Case 141815

Dear Evan Merritt:

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 strictly adhere to the contribution and expenditure limits while registered under mini reporting or to timely request to switch to the “Full Reporting” option and file all required reports of contributions and expenditures. 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 [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

*Electronically signed*

Jennifer Hansen  
Compliance Officer

Endorsed by,

*Electronically signed*

Peter Frey Lavallee  
Executive Director



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April 18, 2024

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

Subject: Complaint regarding Evan Merritt, PDC Case 141815

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 26, 2023. The complaint alleged that Evan Merritt, a candidate for Fire Commissioner for Snohomish County Fire Protection District 04, Position 1, may have violated RCW 42.17A.205, .235 and .240 and WAC 390-16-125 for accepting a contribution in excess of the \$500 per donor aggregate amount thereby exceeding the mini reporting limits without registering and filing Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign under the “Full Reporting” option.

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; 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 July 12, 2019, Evan Merritt submitted a Candidate Registration (C-1 report) declaring his candidacy for Fire Commissioner for Snohomish County Fire Protection District 04, Position 1 in the 2019 election, listing himself as Treasurer and choosing the “Mini Reporting” option.
- WAC 390-16-105 describes a campaign’s eligibility and restrictions when registering under mini reporting, specifically that no contribution or contributions from any person other than the candidate may exceed \$500 in the aggregate.
- WAC 390-16-125 states in part that a candidate wishing to change from mini to full reporting must apply electronically to the PDC for authorization to change reporting options before the limitations specified in WAC 390-16-105 are exceeded.
- The complaint alleged that the 2019 Merritt Campaign was registered under the “Mini Reporting” option but had accepted a contribution above the \$500 per donor aggregate limit and had not filed any C-3 or C-4 reports disclosing campaign activities or submitted an amended C-1 report switching to the “Full Reporting” option as of the date of the complaint.
- The 2019 Merritt Campaign received two monetary contributions from IAFF Local 2781 Political Action Committee (IAFF), one for \$500 on August 2, 2019, and a second \$1,000 contribution on August 15, 2019. The second contribution exceeded the \$500 per donor limit for campaigns registered under the “Mini Reporting” option.

- In his initial response, Mr. Merritt stated that he believed that he had only received the first \$500 contribution from IAFF and could not locate records for an additional donation.
- PDC staff received confirmation from IAFF that the \$500 and \$1,000 contribution checks sent to the 2019 Merritt Campaign had both been cashed and no refund of the overlimit contribution could be located.
- Per staff’s request, the Respondent refunded the \$1,000 overlimit contribution to IAFF using personal funds on March 13, 2024. This transaction was verified by IAFF.

The circumstances in this case were mitigated by the fact that the Respondent was a first-time candidate and acted as his own Treasurer and only Campaign Officer. In addition, given the length of time since the contributions were initially received, Mr. Merritt’s options for refunding the overlimit contribution were limited. Finally, the Respondent used personal funds to refund the contribution. It appears that the exceeding of mini reporting limits was due to the limited experience of the Respondent and not done intentionally to mislead the public.

Based on our findings staff has determined that, in this instance, acceptance of a monetary contribution above the \$500 per donor aggregate limit while registered under the “Mini Reporting” option that was subsequently refunded does not support a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Evan Merritt will receive a formal written warning concerning acceptance of a monetary contribution exceeding the \$500 limit for campaigns registered under the “Mini Reporting” option. The formal written warning will include staff’s expectation that Mr. Merritt strictly adheres to the contribution and expenditure limits while registered under mini reporting or timely requests to switch to the “Full Reporting” option and files all 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: Evan Merritt