

Respondent Names

Eastern Washington Voters PAC

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan

Thu, 17 Aug 2023 at 12:49 AM

To whom it may concern,

Once again, it has come to my attention that the Eastern Washington Voters PAC has repeatedly violated Washington State's campaign finance laws (RCW 42.17A). The specific violations are detailed below:

1) Failure to timely report contributions or expenditures (Violation of RCW 42.17A.235, RCW 42.17A.240)

This violation, I believe is serious. I was under the mistaken belief that I have brought up this concern adequately in the past, but it might be more effective for this committee to start paying fines in order to be convinced that they should start filing their reports in a timely manner. In a distressingly, all too often repeated pattern, this committee files reports late (76 reports, to be exact). Many of these reports have been filed weeks, months, or even over a year late. In an effort to help PDC staff properly categorize the lateness of these reports, as has been my custom recently, my attached spreadsheets provide a color-coded reference category for helpful sorting:

Red (Extremely late – harming the public's right to know) 59 extremely late reports – up to 385 days late. There really is no excuse for these and in fact, most of the time, this PAC chose to wait months or over a year to report the truth. This is frankly, absurd, considering their past history. A terrible pattern of behavior structured to deceive the public.

Orange (Concerningly late – delaying the public's right to know) 9 concerningly late reports – up to 10 days late. Again, not legal and not following the law, but consistent behavior in failing to follow the law

Yellow (Sloppily late – delayed reporting) 7 sloppily late reports – up to 3 days late. These could just be mistakes, sloppy bookkeeping, and written off as typical fumbling around by the treasurer, however, I'm including them in this report so that PDC staff can put this general widespread pattern of lawbreaking in context.

Again, I've provided both an Excel file and PDF version of the same file for ease of staff and the lawbreaker's reference as they re-educate themselves with Washington State's campaign

finance laws and are reminded that these laws apply to them as well. They are not exempt from them as much as they might want to pretend these laws don't matter.

Some notes on documenting these violation:

Again, as I strive to provide the best data possible both for efficiency of staff and the lawbreakers I have identified, every report can be directly linked to the URL in the far-right hand column. The date the report was due is provided and the actual date it was finally sent to the PDC and the total number of days late for those reports is included for ease of PDC staff research effort, and to quantify the significance of these violations both individually and cumulatively with the obvious problems caused by not informing the public about the truth of their activities in a timely manner.

Eastern Washington Voters PAC – An ugly history of lawbreaking still to this day

As I implied in the opening statement on this complaint, this PAC has violated this law for many years, and the PDC has provided formal warning letters to this PAC (See PDC Enforcement Case #24432 warning letter attached). Obviously, as PDC staff can verify looking at the attached spreadsheets, this PAC just laughed at the PDC and promptly started violating the laws – THE EXACT SAME LAWS – once again. It is clear and obvious that laughable warning letters from the PDC are not taken seriously with this gang and they appear determined to conceal as much of their activity from the public for as long as they can and there is zero concern about consequences for their lawbreaking.

I made the presumption of assuming they actually cared about compliance the last time I caught them breaking the law, but it appears I need to pay much closer attention here and add them to my frequent flier list for lawbreaking in Washington State.

2) Failure to properly identify as a sponsored committee (Violation of RCW 42.17A.005(47)(b)(i), WAC 390-16-011A)

This Secretive, Dark Money PAC received more than 80% of its funding sourced from one primary sponsor source in 2020. In fact, this PAC that year received 99.9% of its funding source from one Mega PAC sponsor. Specifically, Eastern Washington Voters PAC received all of its cash contributions from another secretive PAC named “Eastern Washington Voters (Federal) PAC” (See PDC C3 Report #101014161 attached for staff reference of one of these sponsor contributions). So, to be fair, during the 2020 calendar year, if there had been any interest in complying with the law, this sponsored PAC should have corrected their C1PC and renamed themselves the “Eastern Washington Voters PAC, sponsored by Eastern Washington Voters (Federal) PAC” but, obviously there was no attempt by this professional, well-funded PAC to follow the law.

The law is very clear, as WAC 390-16-011A clearly states:

“A sponsored political committee must amend its C-1pc sixty days before an election in which it participates if the committee's name on its most recently filed C-1pc does not include at least one current sponsor.”

This political committee failed to comply with the law and correct it's C1PC documents to properly reflect that it was a wholly sponsored PAC with 99.9% of its funding coming from another PAC. This was a flagrant effort to conceal the truth, but it is consistent with how this PAC apparently operates. They obviously believe the laws don't apply to them and clearly they are unconcerned both about the public's right to know and the PDC's ability to enforce the law.

I'm sure they broke more laws than this complaint outlines, but this should be enough for the investigation to begin into the true activities of this secretive dark money PAC with a long and extensive history of breaking the law.

Let me know if you need anything more on this one.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to know what secretive dark money PACs are doing when they try to influence or impact the outcome of local elections. This is particularly true in the case of PACs like this one with a long history of lawbreaking and a determination to ignore the PDC , mock the warnings they have received from the PDC in the past, and then just continue to break the law.

List of attached evidence or contact information where evidence may be found

All details provided in the body of the complaint or as attachments.

List of potential witnesses with contact information to reach them

Everyone remotely involved in this Dark Money PAC

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

100876820	C4	0	10/16/2018	10/29/2018	10/30/2018	12/10/2018	41	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4771649
100939376	C4	0	7/30/2019	8/31/2019	9/10/2019	10/20/2019	40	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4841355
100949720	C3	0	10/30/2019		11/4/2019	12/11/2019	37	\$150.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4852952
110086652	C4	0	3/1/2022	3/31/2022	4/11/2022	5/17/2022	36	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110086652
100899263	C4	0	2/1/2019	2/28/2019	3/11/2019	4/15/2019	35	\$295.01	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4797627
110054816	C4	0	8/1/2021	8/31/2021	9/10/2021	10/12/2021	32	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4974649
110058803	C3	0	9/22/2021		9/27/2021	10/26/2021	29	\$500.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4979105
110105269	C4	0	6/1/2022	6/30/2022	7/12/2022	8/7/2022	26	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110105269
110105270	C4	0	7/1/2022	7/31/2022	7/12/2022	8/7/2022	26	\$281.71	EASTERN WASHINGTON VOTERS (E WV)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110105270
101014185	C4	0	9/1/2020	10/12/2020	10/13/2020	11/3/2020	21	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4917604
100955489	C4	0	12/1/2019	12/31/2019	1/10/2020	1/31/2020	21	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4859412
110071381	C4	0	12/1/2021	12/31/2021	1/10/2022	1/29/2022	19	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4992214
110052249	C3	0	9/18/2021		9/20/2021	10/7/2021	17	\$1.25	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4972055
110052248	C3	0	9/24/2021		9/27/2021	10/7/2021	10	\$220.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4972056
101014161	C3	0	10/23/2020		10/26/2020	11/3/2020	8	\$1,500.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4917580
110114003	C4	0	8/1/2022	8/31/2022	9/12/2022	9/19/2022	7	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110114003
110086653	C4	0	4/1/2022	4/30/2022	5/10/2022	5/17/2022	7	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110086653
110086654	C4	110086653	4/1/2022	4/30/2022	5/10/2022	5/17/2022	7	\$30.00	EASTERN WASHINGTON VOTERS (E WV)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110086654
101014186	C4	0	10/13/2020	10/26/2020	10/27/2020	11/3/2020	7	\$950.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4917605
100939377	C4	0	9/1/2019	10/14/2019	10/15/2019	10/20/2019	5	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4841356
100899264	C4	0	3/1/2019	3/31/2019	4/10/2019	4/15/2019	5	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4797628
100899257	C3	0	3/25/2019		4/10/2019	4/15/2019	5	\$350.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4797555
100910598	C4	0	5/1/2019	5/31/2019	6/10/2019	6/13/2019	3	\$924.92	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4811053
100903983	C4	0	4/1/2019	4/30/2019	5/10/2019	5/13/2019	3	\$380.09	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4803867
110056652	C3	0	10/14/2021		10/18/2021	10/20/2021	2	\$250.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4976681
101014162	C3	0	10/31/2020		11/2/2020	11/3/2020	1	\$0.02	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4917581
100949779	C4	100949721	10/29/2019	11/30/2019	12/10/2019	12/11/2019	1	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4853035
100949721	C4	0	10/29/2019	11/30/2019	12/10/2019	12/11/2019	1	\$0.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4852953
100949719	C3	0	11/20/2019		12/10/2019	12/11/2019	1	\$100.00	EASTERN WASHINGTON VOTERS (E WV)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4852951

Show entries

[Download 4 rows as CSV.](#)

Date	Contributor	City	State	Type	Employer	Occupation	Amount	Report
10/31/2020	MISCELLANEOUS RECEIPTS			Cash			\$0.02	View Report
10/23/2020	EASTERN WASHINGTON VOTERS (FEDERAL)	SPOKANE	WA	Cash			\$1,500.00	View Report
02/11/2020	EASTERN WASHINGTON VOTERS (FEDERAL)	SPOKANE	WA	Cash			\$13.38	View Report
01/09/2020	EASTERN WASHINGTON VOTERS (FEDERAL)	SPOKANE	WA	Cash			\$175.00	View Report

Showing 1 to 4 of 4 entries

Previous

1

Next

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

101014161

11-03-2020

Candidate or Committee Name (Do not abbreviate. Use full name.)
EASTERN WASHINGTON VOTERS

Mailing Address
35 W. MAIN AVE, #270

City **SPOKANE, WA** Zip + 4 **99201** Office Sought (candidates) Election Date **2020**

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
10/23/20	EASTERN WASHINGTON VOTERS 2014 W. BRIDGE AVE SPOKANE, WA 99201				\$1,500.00	\$1,688.38
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$1,500.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$1,500.00

4. Date of Deposit **10/23/20**

Treasurer's Daytime Telephone No.: **(509)330-1793**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature **BRYAN BURKE** Date **11-03-2020**



**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 • Website: www.pdca.wa.gov

May 30, 2019

Sent electronically to info@ewvoters.org

Subject: Complaints filed by Glen Morgan, Re: Eastern Washington Voters, PDC Case 24432

Dear: Bryan Burke:

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) alleging Eastern Washington Voters violated RCW 42.17A.235 and .240 for failing to timely and accurately report contributions, expenditures, and debt, and failing to provide proper expenditure descriptions, RCW 42.17A.205 for failing to list committee officers, and RCW 42.17A.425 for prohibited authorization of expenditures by non-committee officers.

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.

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter to Mr. Morgan. This formal written warning comes with staff's expectation you will file timely, complete and accurate reports in future years in accordance with PDC laws and rules, and list on the committee registration all those who authorize expenditures.

Additionally, in your response, you indicate "Since my name is on the C-1PC and I have the authority to make and incur expenses on the behalf of the committee, our PAC is in compliance with 42.17A.425." To be clear, the law dictates that only persons listed on the registration form may authorize expenditures. So, as the only person so listed, only you can authorize 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 Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s_____

Alice Fiman
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

May 30, 2019

Sent Electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Eastern Washington Voters, PDC Case 24432

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 11, 2017.

Your complaints alleged Eastern Washington Voters (the Committee) may have violated: (1) RCW 42.17A.235 and .240 for failing to accurately and timely file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports); (2) RCW 42.17A.240 for failing to properly report expenditures and debts on C-4 reports, including the failure to provide proper expenditure descriptions; and (3) RCW 42.17A.205 for failing to list committee officers, and RCW 42.17A.425 for prohibited authorization of expenditures by non-committee officers.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the Committee, and the response from Bryan E. Burke Treasurer and Executive Director of Eastern Washington Voters.

Based on staff's review, we found the following:

- Eastern Washington Voters is an on-going Committee, with an address in Spokane, Washington that has been registered with the PDC since at least 2004.
- The Committee's most recent Political Committee Registration (C-1pc) was filed April 13, 2015, with the Committee choosing the Full Reporting option and listing Bryan Burke as campaign manager and treasurer.

Allegation #1: Failure to timely and accurately file C-3 and C-4 reports

- The complaint alleged the Committee failed to timely file C-3 and C-4 reports in 2015, 2016 and 2017. You attached a spreadsheet of those reports, noting in those three years, 102 of the Committee's 201 contributions were filed from five to 172 days late and 265 of the Committee's 544 expenditures were filed between two and 178 days late
- During the 2015 election year, the Committee filed a total of 65 C-3 and C-4 reports disclosing \$9,070.09 in contributions and \$8,404.16 in expenditure activities. Seven were filed as amended reports.
- During the 2016 election year, the Committee filed a total of 64 C-3 and C-4 reports disclosing \$10,619.95 in contributions and \$8,846.36 in expenditure activities. Ten were filed as amended reports.
- During the 2017 election year, the Committee filed a total of 66 C-3 and C-4 reports disclosing \$9,042.67 in contributions and \$10,428.11 in expenditure activities. Sixteen were filed as amended reports.
- In the response, Burke stated, "Yes, as Mr. Morgan pointed out, some of my reports of expenditures were late. I personally take responsibility for those that were late." The response continued, stating "When we use our State PAC to try to influence elections, the large majority of our expenses are for rent and staff to coordinate volunteers. However, PDC regulated election activities are a small part of our work. During the last six years, the amount spent on phone calls, door belling, leafleting, or the in-house generation of small-volume mailers to support or oppose electoral races has ranged from about \$1,000 to probably not more than \$3,000 out of budget between \$7,000 and \$37,000. I believe it has been nine years since EWV purchased political advertising or donated more than \$25 in money to a candidate."
- Eastern Washington Voters' largest expenditure to a candidate or political party in 2015, 2016 or 2017 was a \$200 expenditure made October 25, 2015 to the Spokane County Democrats.

Allegation #2: Failure to disclose debts and obligations on C-4 reports.

- The complaint alleged that the Committee failed to disclose debts and obligations on C-4 reports and properly provide detailed breakdown descriptions of expenditures. You attached a spreadsheet of those expenditures.
- In the response, Burke stated "Most of what Mr. Morgan is calling debt for unpaid expenses was not actually debt held by the committee. As I wrote, the majority of our expenses that Mr. Morgan thought were debts were for rent and staff."

- Regularly recurring expenses of the same amount (such as rent, utilities, insurance, cellular phone costs, and payments to campaign staff) do not have to be reported unless they were past due on the last day of the reporting period.

Allegation #3: Failing to provide sub-vendor information for expenditures disclosed on C-4 reports

- The complaint alleged that the Committee failed to properly provide detailed descriptions of expenditures. You attached a spreadsheet of those expenditures.
- In the response, Burke stated “Where appropriate, I provided the additional information in Appendix B that Mr. Morgan requested. However, I believe that many or most of these expenses were adequately documented. These include expenditures that involved reimbursement of either EWV or myself to correct for when I grabbed the wrong debit card. Those reimbursements are well documented in other PDC reports. In some cases, my description of the item and vendor was well documented in the PDC report, but in Mr. Morgan’s list of expenditures it was truncated (probably a formatting issue).
- The Committee made good faith efforts to comply with the reporting requirements of RCW 42.17A.240 concerning expenditures undertaken by the campaign on its C-4 reports. The public was not deprived of critical information as the dates, amounts, and purposes of the expenditures were disclosed, and requiring further amendments to disclose the sub-vendors would not have a significant or material impact on the public.

Allegation # 4: Failure to list committee officers, and prohibited authorization of expenditures by non-committee officers.

- In the response, Burke stated, “The decision to list myself as the only officer of our state political committee was mine alone, and it was based on two factors. First, my board allows me the discretion to decide in the end which races to involve ourselves, which candidates to support, and how much money to spend on the race, and where and when to spend it. Second, I relied on the advice of PDC staff about who should be included on PDC paperwork.”
- PDC staff has informed Burke of RCW 42.17A.425 and his responsibility to authorize all expenditures or list others on the C-1pc as officers who will authorize expenditures.

Based on these findings, staff has determined that in this instance, the failure to timely and accurately file reports of contributions and expenditures and disclose debts and obligations does not amount to an actual violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), Eastern Washington Voters will receive a formal written warning concerning the Committee’s failure to comply with filing requirements as noted in this letter.

The formal written warning will include staff’s expectation Eastern Washington Voters timely file all future required reports of contributions and expenditures and disclose debts and obligations and list on the committee registration all those who authorize 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 Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail fdc@fdc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Peter Lavalley
Executive Director

/s _____