



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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May 22, 2024

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint against 18th Legislative District Democrats, PDC Case 149477

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed Feb. 26, 2024. The complaint alleged the 18th Legislative District Democrats, a political committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately file contribution and expenditure reports.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the 18th Legislative District Democrats; the applicable PDC reports filed by the 18th Legislative District Democrats; 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:

- RCW 42.17A.240 requires that committees file accurate campaign finance reports with the Public Disclosure Commission.
- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities, including the requirement that a committee deposit all contributions within five business days of receipt and also file a report on the 10th day of the month if contributions of \$200 or more are received in the prior month.
- As noted in the complaint, the Washington State Democratic Central Committee reported contributing \$2,000 to the 18th Legislative District Democrats on August 23, 2023.
- In response to the complaint, Paulina Oberg, treasurer for 18th Legislative District Democrats, acknowledged receiving \$2,000 from the Washington State Democratic Central Committee in fall 2023, but Oberg stated the Committee “did not give to nor spend in support of any candidates nor other political organizations these nor any other funds.”
- Per RCW 42.17A.235, the \$2,000 contribution should have been reported on a Cash Receipts Monetary Contributions (C-3) Report on Oct. 10, 2023.
- On a C-3 report filed May 9, 2024, the 18th Legislative District Democrats reported the \$2,000 donation as received and deposited Aug. 25, 2023. The report was filed 212 days late.

- In addition to the late-reported contribution, the 18th Legislative District Democrats filed additional reports for the years 2022, 2023, and 2024.
- The additional 2022 reports included \$353 in additional contributions and \$1,364.31 in unreported expenditures, while the 2023 reports included a total of \$7,460.50 in contributions and \$3,820.32 in expenditures.
- Oberg noted that “in 2023, the 18th LD Democrats total annual contributions and individual and total expenses were under the threshold for Mini Reporting. Although, I now understand that the \$2,000 grant given by the Washington State Democrats in the Fall of 2023 changed our qualifying for a Mini Reporting for that year.”
- The Committee’s 2024 reports are now in compliance through April 2024 and Oberg stated, “[W]e are appreciative of Mr. Morgan bringing this matter to our attention as we want to be in compliance.”
- The 18th Legislative District Democrats do not have other similar violations of PDC requirements.

Based on our findings staff has determined that, in this instance, the circumstances do not support a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, the 18th Legislative District Democrats will receive a formal written warning concerning the requirement under RCW 42.17A.235 and .240. Staff expects the committee, moving forward, to timely and accurately file all future required reports of contributions. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Alice Fiman
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director