



**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)

July 17, 2024

Delivered electronically to "tim.kestell@kiemlehagood.com"

Subject: PDC Case 141989

Dear Citizens for Spokane Schools PAC:

Enclosed 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 enclosed letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, Citizens for Spokane Schools PAC completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and 42.17A.240 by failing to timely report contributions totaling \$2,297.93 on PDC Form C-3 (Cash Receipts Monetary Contributions) and contributions totaling \$71,441.33 and expenditures totaling \$75,752.08 on PDC Form C-4 (Summary, Full Report Receipts and Expenditures).

Payment of the \$300 penalty resolves the allegations listed in the complaint and the additional areas investigated by PDC staff.

If you have questions, you may contact the PDC at 360-753-1111, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,  
*Electronically Signed Philip E. Stutzman*  
Phil Stutzman  
Compliance Officer

Endorsed by,  
*Electronically Signed Peter Frey Lavallee*  
Peter Frey Lavallee  
Executive Director



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July 17, 2024

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Citizens for Spokane Schools PAC, PDC Case 141989

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 28, 2023. Your complaint alleged that Citizens for Spokane Schools PAC (PAC or Committee) may have violated RCW 42.17A.235 and .240 by failing to timely report contributions and expenditures during the period identified in the spreadsheet you provided, which covers reporting from July 31, 2018 to February 28, 2022. Your complaint also alleged Citizens for Spokane Schools PAC may have violated RCW 42.17A.445 by using PAC money for personal, non-PAC, uses.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Citizens for Spokane Schools PAC; the applicable PDC reports filed by the Respondent; 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:

- Citizens for Spokane Schools PAC stated they are a group of parents and volunteers formed to support the passage of Spokane Public Schools (District 81) levies and bonds. The Committee stated they are supported by Spokane citizens, teachers, administrators, businesses, parents, and local organizations.
- The 2018 records for Citizens for Spokane Schools PAC were incomplete and unreported due to the illness and subsequent death of the PAC treasurer, Ellen Robey, on May 12, 2020. Even though Ms. Robey failed to file several C-4 reports in a timely manner during her illness, the campaign timely filed all but four C-3 reports during the preceding five years.
- Once the campaign records were obtained from the estate of Ms. Robey, the Committee located a new treasurer (Barbara Marney) who assumed her duties in November 2020. Ms. Marney completed the 2018 reports and brought the 2021 records up to date by January 2021.
- The PAC filed four C-3 Reports between 58 and 364 days late. The C-3 reports totaled \$2,297.93 and were due between 12/10/2019 and 8/10/2021.

- The Committee filed 15 C-4 Reports between 7 and 549 days late. The C-4 reports totaled \$71,441.33 in contributions and \$75,752.08 in expenditures and were due between 6/10/2019 and 3/10/2022.
- Of the \$71,441.33 in total late-filed C-4 Report contributions, all but \$2,297.93 were timely reported on C-3 Reports.
- Of the \$75,752.08 in total late-filed expenditures, all but \$914.82 were filed 7 days late.
- The largest late-filed C-4 Report was filed 7 days late and included \$39,410 in contributions and \$74,837.26 in expenditures. The contributions were timely reported on C-3 Reports.
- The Committee denied that the PAC absconded with \$27.10 over the course of its formation, stating that this amount was attributed to a simple bookkeeping oversight while reconciling bank fees and fee refunds.
- The alleged unexplained starting balance of \$1,896.79 on the first C-4 report for the 2024 campaign, covering the period 4/1/2021 to 4/30/2021, was a carry forward to the 2024 campaign from the 2021 campaign. It is identified on the final 2021 C-4 Report, covering the period 3/1/2021 to 3/31/2021, as an expenditure on 3/31/2021 to the 2024 campaign, described as "carry forward cash to 2024 election." The report was timely filed on 4/5/2021.

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

However, Citizens for Spokane Schools PAC has completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and 42.17A.240 by failing to timely report contributions totaling \$2,297.93 on PDC Form C-3 (Cash Receipts Monetary Contributions) and contributions totaling \$71,441.33 and expenditures totaling \$75,752.08 on PDC Form C-4 (Summary, Full Report Receipts and Expenditures). The \$300 assessed penalty resolves the allegations listed in your complaint.

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 the PDC at 360-753-1111, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,  
*Electronically Signed Philip E. Stutzman*  
Phil Stutzman  
Compliance Officer

Endorsed by,  
*Electronically Signed Peter Frey Lavalley*  
Peter Frey Lavalley  
Executive Director

cc: Citizens for Spokane Schools PAC