



**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.pdcc.wa.gov](http://www.pdcc.wa.gov)**

July 31, 2024

Delivered electronically to kidsarethepoint@gmail.com and defilippis@workerlaw.com

Subject: Complaint filed by Glen Morgan, PDC Case 153195

Dear Clover Park Citizens for Schools:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

Pursuant to WAC 390-37-060(1)(f), you completed and signed a Statement of Understanding (SOU) and paid a \$600 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule). The signed SOU was received by the PDC staff on July 30, 2024. By signing the SOU, you acknowledged violations of RCW 42.17A.235 and RCW 42.17A.240.

Accordingly, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

PDC staff expects that, in the future, you follow all applicable PDC laws, rules and guidance. If violations of PDC laws or rules occur in the future, the Commission will consider the SOU in deciding on further Commission action.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s/ Electronically signed

Alice Fiman  
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavallee  
Executive Director



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July 31, 2024

Delivered electronically to [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint against Clover Park Citizens for Schools, PDC Case 153195

Dear Glen Morgan:

The Public Disclosure Commission (PDC) completed its review and assessment of the complaint you filed April 29, 2024. The complaint alleged that Clover Park Citizens for Schools may have violated RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately file Cash Receipts Monetary Contributions (C-3) reports and Summary Full Campaign Contributions and Expenditures (C-4) reports.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by Clover Park Citizens for Schools; the applicable PDC reports filed by Clover Park Citizens for Schools; 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:

- Clover Park Citizens for Schools (the Committee) is an Education Political Committee that has been registered with the PDC since at least 2008.
- The Committee's most recent registration, filed December 12, 2023, was listed as supporting a levy, bond or advisory vote in the February 2024 Special Election.
- Clover Park School District Proposition No. 1 was approved by voters in February 2024, receiving 59.57 percent of the vote.
- As noted in the complaint, the Committee filed numerous C-3 and C-4 reports in January 2024, reporting contributions and expenditures made between 2018 and 2024.
- In response, Juliana DeFilippis, attorney for the Committee, responded to the complaint noting the Committee's current (2023-2024) volunteers "realized the volunteer who used to oversee the PAC's reporting requirements was under the mistaken impression that the PAC was below the reporting threshold. After this realization, Clover Park hired a new accountant and legal counsel to ensure future compliance."

- The majority of C-3 reports filed with the PDC in January 2024 reported payroll deductions from Clover Park School District employees.
- DeFilippis continued, noting the PDC was informed of the Committee’s actions to bring reporting into compliance before the complaint was filed and the Committee “provided a letter that explained the PAC’s history and requested an alternate response to investigation or adjudication if a complaint should issue.”
- The Committee timely filed two C-4 reports prior to the February 2024 Special Election. The first, filed January 23, 2024, listed \$18,106 in contributions during the campaign and \$1,431.23 in expenditures. The second, filed February 6, 2024, listed \$18,106 in contributions and \$7,685.31 in expenditures.
- While the Committee filed the pre-election reports timely, the amended reports filed in January 2024 included significantly different contribution and expenditure activity than was originally reported, which materially impacted the public interest.

Pursuant to WAC 390-37-060(1)(f), Clover Park Citizens for Schools completed a Statement of Understanding (SOU) and paid a \$600 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240. The \$600 penalty assessed resolves the allegations listed in the complaint.

Accordingly, 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, contact Alice Fiman at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s/ Electronically signed  
Alice Fiman  
Compliance Officer

Endorsed by,

/s/ Electronically signed  
Peter Frey Lavalley  
Executive Director