



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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**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)**

December 12, 2023

Delivered electronically to Pacific County Democratic Central Committee at  
“jenna.manchester@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 142009

Dear Pacific County Democratic Central Committee:

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 Pacific County Democratic Central Committee’s failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. Staff expects you to timely and accurately file all required reports of contributions and expenditures including accurate carry forward balances and the inclusion of address information for vendors used for in-kind contributions on C-4 reports in future years. 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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December 12, 2023

Delivered electronically to Glen Morgan at “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaint regarding Pacific County Democratic Central Committee, PDC Case 142009

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 30, 2023. The complaint alleged that the Pacific County Democratic Central Committee, a political committee, previously inactive and currently registered with the PDC, may have violated: (1) RCW 42.17A.235 & .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing a correct carry forward balance; and (2) RCW 42.17A.235 & .240 for failing to include contributor detail for in-kind contributions.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Treasurer Jennifer Manchester on behalf of 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:

- The Pacific County Democratic Central Committee had previously been registered and reporting with the PDC until the end of calendar year 2017, when they formally dissolved as a political party committee. The remaining balance of \$16,699.60 was transferred to the Washington State Democrats and the bank account was closed.
- As part of the resolution of PDC Case #24460 in April 2019, the Respondent registered as an “other committee” selecting the “Mini Reporting” option, for the sole purpose of soliciting enough funds in small contributions to pay the \$300 civil penalty as agreed in a signed Statement of Understanding.
- On January 20, 2022, PDC staff received an email from Club Chair, Mike Cassinelli, and Club Secretary, Carol Ham, confirming that the Democrats of Pacific County Club (previously known as the Pacific County Democrats) does not receive contributions or make expenditures to support of oppose candidates or ballot measures and is not a political action committee. The email further explained that the Club receives contributions and makes expenditures to support youth and non-profit organizations in Pacific County, including scholarships to local students and donations to area food banks.
- Staff’s review reflects that no candidate or political committee reported receipt of contributions from the Democrats of Pacific County Club or the Pacific County Democrats during the time the group was dissolved or otherwise not required to register and report as a political committee with the PDC.

- In her response, Ms. Manchester stated that the group re-constituted as a bona fide party committee prior to accepting contributions or making expenditures to support or oppose candidates or ballot measures, and as required by statute, reported the cash on hand at the beginning of that period.
- Ms. Manchester further confirmed that the committee maintained records of the source of the funds used for the \$2,120.12 beginning balance. As these funds were received at a time before the group met the statutory definition of a political committee, they were not reported. In the interest of transparency, PDC staff requested that the Respondent disclose the source of these funds.
- Regarding the committee's failure to disclose contributor detail for in-kind contributions, Ms. Manchester acknowledged the lack of vendor information. She committed to accurate reporting in the future now that the requirement for reporting in-kind contributions is better understood.
- PDC staff notes that, in previous years, the PDC's ORCA (Online Reporting of Campaign Activity) lacked the vendor breakdown and lengthy text entry capabilities included in the current version.
- During the investigation, staff found that the recent in-kind contributions disclosed on the C-4 reports for 2023 included the donor's name and address, a detailed description of the goods or services provided, plus the name and address of the vendor used.

It appears that the discrepancy in the beginning balance and the omission of the address for vendors used in making in-kind contributions were unintentional and not done to conceal campaign information from the public. The committee has reported detailed information for vendors on current 2023 C-4 reports and has committed to continue to comply with this requirement in the future. Staff found no evidence that the Respondent purposely omitted information. Regarding the beginning balance, staff found that funds were collected prior to the Respondent meeting the definition of a political committee and was therefore not yet required to register and report with the PDC; the fund sources have since been identified.

Based on our findings staff has determined that, in this instance, failure to disclose an accurate carry forward balance and failure to include address information for vendors used to make in-kind contributions does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, the Respondent will receive a formal written warning concerning failure to timely disclosure of an accurate carry forward balance and failure to include the address for vendors used in making in-kind contributions. The formal written warning will include staff's expectation that Pacific County Democratic Central Committee accurately files all future required reports of contributions and expenditures, including carry forward balances and detailed information regarding in-kind contributions. 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@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically signed*

Endorsed by,

*Electronically signed*

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Jennifer Hansen  
Compliance Officer

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Peter Frey Lavalley  
Executive Director

cc: Pacific County Democratic Central Committee