## **Complaint Description**

# File a Formal Complaint - Glen Morgan

Glen Morgan reported (Wed, 20 Jun at 11:42 AM) via Portal Meta

To Whom it May Concern -

It has come to my attention that Steve Tharinger (state legislator in the 24<sup>th</sup> Legislative District) has committed multiple violations of **RCW 42.17A**.

1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, Steve Tharinger has failed on numerous occasions to do this. (See Exhibits A - "Illegally late deposits and contributions").

Please note that these reports were reported over **222 cumulative days late.** This isn't just a technical mistake or error, and although others have violated our state's campaign finance laws worse than Tharinger, that does not excuse his violations in this case. Many of these are first time reports, and not just technical corrections. Several of these late reports occurred during the critical 30day window of the 2016 campaign and by their failure to provide accurate and complete information about both the funding and expenditures of the Tharinger campaign, they have denied the public the right to know the truth about the Tharinger campaign. Please not both Tharinger and his treasurer are seasoned and experienced in the political process and are well aware of the significance of their repetitive violations of state law. Of even greater concern is how many additional violations have been committed by this campaign and have yet to be revealed to the public.

The PDC should investigate the possibility that Steve Tharinger committed the above violations willfully and maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c).** If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please note that I have provided the attached spreadsheet in two different file formats for staff convenience.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

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

The public (and the media - who often report the facts to the public) has been repeatedly and systematically denied accurate, correct, and timely information about who is funding Rep. Tharinger's political campaigns, how he is spending his money and by doing so, he is disguising and obscuring the source of funding for his political campaigns and how his campaign is spending that same money. This is far more than just a technical mistake. Many of these reports are submitted months late, and several covered the critical campaign period of 30days before the election in 2016.

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

A list has been provided in both Excel and PDF file formats for staff convenience which details each late C3 and C4 report, including PDC tracking #s for each report, date they were due, date they were filed and the days late for each. Additionally, for staff convenience the total days late for these reports has been included in these reports and referenced in the original complaint.

#### List of potential witnesses with contact information to reach them.

All information provided and referenced can be verified using publicly available C3 and C4 reports as referenced in the complaint and backup documents provided. Please note, judging from the extensive, repetitive, and egregious nature of these violations, this investigation may require interviewing both Mr. Tharinger and his treasurer to see how many additional reports are missing or missing information.