

## File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Tue, 6 Feb at 10:06 PM) via Portal **Meta**  
To Whom it may Concern,

There is clear reason to believe multiple violations of **RCW 42.17A** have been committed, once again by Teresa Purcell, once again as part of her 2016 failed campaign for the state House of Representatives. Despite the handful of complaints and allegations already alleged, filed, accepted, and expanded by the Washington State Attorney General's office(**Thurston County Superior Court Case #16-2-04959-34**) , it appears that there are additional, newly discovered violations of the state's campaign finance laws by Teresa Purcell. These allegations have not yet been brought to the attention of the PDC until now.

Additionally, Purcell may have committed other violations not listed, or connected to those listed below.

**1) State law establishes contribution limits. RCW 42.17A.405 State law also establishes that candidates must return contributions that exceed the contribution limits contained in RCW 42.17A.405 within 10 days of receipt. RCW 42.17A.110, WAC 390-16-312. State rule further defines contribution to include expenditures made in concert with a candidate and defines such. WAC 390-05-210. Failure to file C6 form. RCW 42.17A.255.**

- Jo Brewer contributed \$2000 to Teresa Purcell's 2016 campaign, \$1000 on April 25, 2016 and \$1000 on 9/21/2016. (See **PDC Report No. 100761149, 100722155**)

- During the campaign, Jo Brewer (who was a Longview Housing Authority Commissioner), paid several homeless individuals (all "homeless vets" according to the agency) who were clients of the agency to erect campaign signs and perform other campaign services for Purcell. This is a potential illegal use of public resources which is also being investigated under **PDC Case No. 29832**.

See article:

[http://tdn.com/news/local/longview-housing-agency-faces-campaign-complaint/article\\_ddcad31a-802a-5c3e-8f22-139429947d4b.html](http://tdn.com/news/local/longview-housing-agency-faces-campaign-complaint/article_ddcad31a-802a-5c3e-8f22-139429947d4b.html)

It appears that the services of these homeless individuals were purchased with Jo Brewer's personal funds. *See attached e-mail from Chris Pegg to a paralegal assigned to one of my attorneys*

Expenditures made by Jo Brewer to promote Teresa Purcell constitute "contributions" to Purcell's campaign per **RCW 42.17A.005** and **WAC 390-05-210(3)(d)**, which states, in part:

**(3) Consulting with a state, local or judicial candidate.** An expenditure made by a person in cooperation, consultation, concert or collaboration with, or at the request or suggestion of a candidate, the candidate's authorized committee or agent is a contribution to such candidate. An expenditure is presumed to be made in cooperation, consultation, concert or collaboration with, or at the request or suggestion of a candidate, the candidate's authorized committee or agent when:

**(d) The expenditure is made by or in consultation with any person who, during the twelve months preceding the expenditure, is or has been receiving any form of campaign-related compensation or reimbursement from the candidate, the candidate's authorized committee or agent. [emphasis added-GM]**

See below table of expenditures to B Jo Brewer showing reimbursements from Purcell campaign:

#### **PURCELL TERESA M, 2016**

<b>Recipient Name</b>	<b>Date</b>	<b>Description</b>	<b>Amount</b>	<b>Report</b>
<b>BREWER JO</b>	<b>10/19/2016</b>	<b>OFFICE SUPPLIES</b>	<b>56.13</b>	<b>C4</b>
<b>BREWER JO</b>	<b>07/19/2016</b>	<b>REIMBURSEMENT</b>	<b>125.00</b>	<b>C4</b>
<b>BREWER JO</b>	<b>06/19/2016</b>	<b>DELIVERING YARD SIGNS</b>	<b>60.00</b>	<b>C4</b>

- If the expenditures were not made in consultation with Purcell (which appears unlikely), then Brewer would have had to file a C6 form detailing her pro-Purcell expenditures, which she failed to do.

- Because Brewer had already donated the maximum allowable amount to Purcell's campaign, any expenditure from Brewer to hire "homeless vets" as "campaign volunteers" constituted an over limit contribution to Purcell's campaign.

- Despite this expenditure of funds constituting an over-limit contribution, Purcell failed to reimburse Jo Brewer within 10 business days as required by state law, which would have been one option to avoid violating the statute.

- In addition to the above campaign finance violations, Purcell and/or Brewer may have violated working condition standards by failing to pay the “homeless vets” a legally adequate (minimum) wage for the labor they were performing. This practice is known as "wage theft". The PDC should refer this complaint to the Federal Department of Labor and the state Department of Labor and Industries. These violations fall outside the jurisdiction of the PDC, but the AG would have more cause to refer violations like this to these relevant departments.

It should also be noted that Chris Pegg (the executive director of the Longview Housing Authority) is the wife of Dianne Quast, a recent failed Longview City Council candidate from the 2017 election cycle. Quast was also the treasurer for Teresa Purcell's failed 2016 bid for the Legislature. These close relationships between the campaign and a public entity (the Longview Housing Authority) when combined with these violations of the law are concerning. They are particularly concerning when they are being utilized to violate the law and conceal the violations from both the public and the agencies investigating the violations.

For the record, this entire campaign was run exceptionally sloppily with an almost total and willful disregard for the state’s campaign finance laws. This is noteworthy because Purcell had extensive experience as a campaign consultant with detailed knowledge of the law.

The PDC should investigate the possibility that Teresa Purcell 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. It should be noted, Purcell has been in active litigation with the Attorney General's office since December 19, 2016 (**Thurston County Superior Court Case #16-2-04959-34**), which makes these recently discovered violations all the more noteworthy and relevant. If these additional violations were disguised or hidden from the investigators of either the PDC or the AG’s office, that would constitute substantial evidence of willful and malicious violations of the state’s campaign finance laws.

Best Regards,

Glen Morgan

(please note, my email has changed for this and all future correspondence with the PDC)

