

Respondent Name
Lewis County Democratic Central Committee - Non-Exempt
Complainant Name
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (Fri, 18 Aug 2023 at 12:28 PM)</p> <p>To whom it may concern,</p> <p>It has come to my attention (once again) that the Lewis County Democrats are violating Washington State's campaign finance laws (RCW 42.17A). The specific violations are as follows:</p> <p>1) Attempting to conceal the truth about political activity from the public by waiting weeks, months, or more to report what they did or who funded them (Violation RCW 42.17A.235, RCW 42.17A.240)</p> <p>I realize this allegation doesn't surprise anyone who has paid any attention to this shady group over the past few years. This crew was caught breaking this exact law last time (PDC Enforcement Case #26735 and was formally sanctioned with a Warning Letter at the time – See attached Warning Letter and original complaint I filed against this crew in late 2017). This group apparently enjoys breaking the law, so I thought I would revisit their activities once again and help the PDC address this troubled group and their wayward ways.</p> <p><i>PDC Staff note: It appears, just like in a few other enforcement cases I've referenced to the PDC recently, Case #26735 is incorrectly organized with the named Treasurer as the Respondent rather than the PAC name, which has become the normal naming convention for the past 10 years. It is possible someone on the IT side of things might want to make that correction).</i></p> <p>As has been my habit lately, I've attached a spreadsheet with color-coded sorting for the egregiously late reports (red). Normally, for variety sake at least, I'd also highlight the problematic late reports (orange), and the sloppily late reports (yellow). However, everything they did was way out of compliance and not even close to the legal requirements on timeliness of reporting, so everything is red. Frankly, this was impressive that after receiving their last warning letter from the PDC based on my last complaint, it just looks like they decided to escalate their break their lawbreaking. I don't quite understand that behavior, but it seems to be common – maybe all the cool kids are doing it? This is even more impressive considering the fact this group had shifted from mini-reporting to full reporting just a few years ago and then promptly decided to break the law on a regular basis (go back and read the last warning letter they got). Weird, I know, but I have found some of these guys just enjoy violating Washington State's campaign laws out of habit and almost like an addiction, and this group seems to fall into that category.</p> <p>Again, I've provided both an Excel file and PDF version of the same file for ease of staff and the lawbreaker's reference as they re-educate themselves with Washington State's campaign finance laws and are reminded that these laws apply to them as well. They are not exempt from them as much as they might want to pretend these laws don't matter or apply to them.</p> <p>Some notes on documenting these violations:</p> <p>Again, as I strive to provide the best data possible both for efficiency of staff and the lawbreakers I have identified, every report can be directly linked to the URL in the far-right hand column. The date the report was due is provided and the actual date it was finally sent to the PDC and the total number of days late for</p>

those reports is included for ease of PDC staff research effort, and to quantify the significance of these violations both individually and cumulatively with the obvious problems caused by not informing the public about the truth of their activities in a timely manner.

2. Failure to timely update C1pc to include current officers, essentially keeping the true officers of this PAC secret from the public (Violation of RCW 42.17A.205(2))

I will note for the record that this PAC has struggled in the past with timely filing and updating of their C1PC registration forms (this came up in the last PDC enforcement case against this crew (**See PDC Enforcement Case #26735 warning letter attached for staff reference**)).

However, this list of officers on the current C1PC on file with the PDC seems to be outdated and not consistent with the list of officers promoted on their own website (**screen capture attached for staff reference**). This group may also be responsible for the great crime of misgendering one of their officers who appears to be non-binary on their website, but then, consistent with patriarchal hierarchy and probably a bit of latent racism and homophobia tossed into the mix this political group decided to conceal some of the truth on their actual C1PC filings. I'm not here to judge their racism, homophobia, sexism, or misgendering problems and theoretically the PDC doesn't have authority over that anyway, however these types of discrepancies might clearly indicate they need to update their C1PC filings with the PDC so that the public can know the truth about exactly who or what is running this operation.

3. Failure to list the vendor and the address of the vendor for in-kind contributions, therefore concealing from the public the true source of these contributions (Violation of RCW 42.17A.240, RCW 42.17A.235)

When an individual or entity makes a donation of goods or services to a political committee so that the committee may attempt to sell these goods or services to others in exchange for money, this is an in-kind contribution.

I want to draw attention to the PDC's own website recommendations for how PACs and campaigns need to report this information.

See original link here:

<https://www.pdc.wa.gov/registration-reporting/candidates-committees/contributions/kind-contributions>

Specifically, I want to draw attention to the PDC's specific requirements of reporting:

*"In-kind donations that are not incidental **must** be fully reported in Part 1 of Schedule B to the C-4 **with the following details:** the date the contribution was received; the name and full address of the contributor; **if the in-kind contribution is a good or service purchased from a vendor, include the name and address of the vendor;** a brief description of the contribution; its fair market value; the cumulative total this contributor has given for the primary or general election, whichever applies; a designation whether this contribution is for the primary or general election; and if the contributor is an individual who has cumulatively given more than \$250 to the campaign, including both primary and general contributions, identify the individual's employer (by name, city and state) and occupation."*

This committee has failed to do this for both auction items and regular in-kind contributions.

For both staff and the lawbreaker's reference, **I will detail just one of the many deficient examples provided**, so that the obvious lawbreaking can be more efficiently spotted and hopefully corrected in the future to prevent the need to file complaints like this one:

- **Violation Example #1**- \$161.59 on 4/4/2023 (**PDC Report #100880069, attached for staff reference**), the address for the vendor where generous in-kind contributor Carol Brock purchased the goods is not provided, despite the crystal-clear legal requirement to do so.

There are numerous other examples of this failure to follow the law with most of the in-kind contributions this PAC has reported, but fortunately, this PAC can easily go back and correct these reports to get back to at least a pretense of compliance.

The Lewis County Democrats – a strange history of lawbreaking continues

As referenced earlier in this complaint, this shady political group has a history of breaking the law, even when they are filing as mini-reporting, which frankly takes a lot of work. I've already attached the Warning letter from a few years ago based on my complaint filed against this group in 2017 (See **PDC Enforcement Case #26735, attached for PDC staff reference**).

This history of lawbreaking is impressive considering the smaller volume of cash they reportedly process and the lack of political success this group experiences on a regular basis. It is possible people can find their identity in a variety of ways, and perhaps the non-binary approach this group is taking is an effort to see what laws they can break without getting caught. I don't judge, I just expose the truth, and I encourage PDC staff to provide more aggressive guidance with this group and recognize that, based on recent history here, it appears almost certain that whatever has been reported to the PDC probably doesn't match the actual facts of what is in their bank account or how they have spent it.

In the end, I'm optimistic this group can start to follow the law with enough sanctions and fines to remind them.

Best Regards,

Glen Morgan

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

This shady political group probably can't help itself and lawbreaking is just a way of life here, but perhaps the public can eventually figure out what these guys are doing when the PDC sanctions them again and again in the future. Here we go again, they started breaking the law immediately after getting the last warning letter from the PDC a few years ago. Maybe the public will eventually be informed if the PDC gets a bit more aggressive with them.

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

All referenced inside the complaint and exhibits are provided

List of potential witnesses

Every officer listed, or concealed should be contacted. Probably a subpoena for their bank records would be helpful as well.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



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PO Box 40908 Olympia, WA 98504-0908
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Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT

PO BOX 382
CHEHALIS, WA 98532

Coverage: 04/01/2023 to 04/30/2023

Final report: No

Report number: 110148638

Reporting year: 2023

Date submitted: 05/31/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$3,119.82
2. Cash received (Schedule A line 1).	\$1,030.00	
3. In-kind contributions received (Line 1 schedule B).	\$199.39	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$1,229.39
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$4,349.21
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$295.76
11. Cash expenditures (Line 3 schedule A).	\$120.00	
12. In-kind expenditures (Line 1 schedule B).	\$199.39	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$319.39
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$615.15

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$3,734.06
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$3,734.06

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Cheryl Hammer - 05/31/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
04/05/2023	\$195.00	04/24/2023	\$40.00	04/28/2023	\$795.00

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$1,030.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$120.00
			\$120.00

4. TOTAL EXPENDITURES: \$120.00

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
04/04/2023	Brock Carol 893 Middle Fork Road , Onalaska, WA 98570		Zoom - Subscription for 12 months	Fair market value: \$161.59 Aggregate total (N): \$176.59
04/15/2023	Hammer Cheryl 322 NE Washington Ave. , Chehalis, WA 98532		Postage "Forever" Stamps (USPS)	Fair market value: \$37.80 Aggregate total (N): \$87.80

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period



Lewis County
DEMOCRATS

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Central Committee



- ★ **Chair:** Carol Brock
- ★ **1st Vice Chair:** Pete Hammer
- ★ **2nd Vice Chair:** Farley Walker
- ★ **Treasurer:** Cheryl Hammer
- ★ **Secretary:** Sheila Johnson-Teeter
- ★ **State Committee Person, non-binary:** Mary McHale
- ★ **State Committee Person, female:** Monique Farland
- ★ **Parliamentarian & Election Observer:** Neil Marsh
- ★ **Past Chair:** Sharon White



Lewis County Democrats - Illegally late reports - re

Report #	Type	Amends	Deposit Date	From	Through	Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity
110148820	C4	110148633		1/1/2023	1/31/2023	2/10/2023	6/1/2023	111	\$1.99
110148633	C4	0		1/1/2023	1/31/2023	2/10/2023	5/31/2023	110	\$0.00
110148588	C3	0	1/26/2023			2/10/2023	5/31/2023	110	\$40.00
110148589	C3	0	1/31/2023			2/10/2023	5/31/2023	110	\$60.00
110148635	C4	0		2/1/2023	2/28/2023	3/10/2023	5/31/2023	82	\$292.51
110148613	C3	110148590	2/1/2023			3/10/2023	5/31/2023	82	\$60.00
110148623	C3	110148613	2/1/2023			3/10/2023	5/31/2023	82	\$60.00
110148609	C3	110148592	2/22/2023			3/10/2023	5/31/2023	82	\$200.00
110148627	C3	110148609	2/22/2023			3/10/2023	5/31/2023	82	\$200.00
110148590	C3	0	2/1/2023			3/10/2023	5/31/2023	82	\$60.00
110148592	C3	0	2/22/2023			3/10/2023	5/31/2023	82	\$200.00
110148637	C4	0		3/1/2023	3/31/2023	4/10/2023	5/31/2023	51	\$1.26
110148624	C3	110148601	3/17/2023			4/10/2023	5/31/2023	51	\$10.00
110148601	C3	110148595	3/17/2023			4/10/2023	5/31/2023	51	\$10.00
110148607	C3	110148594	3/15/2023			4/10/2023	5/31/2023	51	\$30.00
110148628	C3	110148607	3/15/2023			4/10/2023	5/31/2023	51	\$30.00
110148594	C3	0	3/15/2023			4/10/2023	5/31/2023	51	\$30.00
110148595	C3	0	3/17/2023			4/10/2023	5/31/2023	51	\$10.00
110148638	C4	0		4/1/2023	4/30/2023	5/10/2023	5/31/2023	21	\$319.39
110148622	C3	110148600	4/5/2023			5/10/2023	5/31/2023	21	\$195.00

110148621 C3	110148599	4/28/2023	5/10/2023	5/31/2023	21	\$795.00
110148620 C3	110148598	4/24/2023	5/10/2023	5/31/2023	21	\$40.00
110148598 C3	110148597	4/24/2023	5/10/2023	5/31/2023	21	\$40.00
110148599 C3	0	4/28/2023	5/10/2023	5/31/2023	21	\$795.00
110148600 C3	110148596	4/5/2023	5/10/2023	5/31/2023	21	\$195.00
110148597 C3	0	4/24/2023	5/10/2023	5/31/2023	21	\$40.00
110148596 C3	0	4/5/2023	5/10/2023	5/31/2023	21	\$195.00

cent lawbreaking list

Filer

[illegible]

[illegible]

Hyperlink

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148820>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148633>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148588>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148589>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148635>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148613>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148623>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148609>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148627>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148590>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148592>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148637>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148624>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148601>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148607>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148628>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148594>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148595>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148638>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148622>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148621>

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<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148600>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148597>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148596>

Lewis County Democrats - Illegally late reports - recent lawbreaking list

Report #	Type	Amends	Deposit Date	From	Through	Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity	Filer	Hyperlink
110148820	C4	110148633		1/1/2023	1/31/2023	2/10/2023	6/1/2023	111	\$1.99	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148820
110148633	C4	0		1/1/2023	1/31/2023	2/10/2023	5/31/2023	110	\$0.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148633
110148588	C3	0	1/26/2023			2/10/2023	5/31/2023	110	\$40.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148588
110148589	C3	0	1/31/2023			2/10/2023	5/31/2023	110	\$60.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148589
110148635	C4	0		2/1/2023	2/28/2023	3/10/2023	5/31/2023	82	\$292.51	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148635
110148613	C3	110148590	2/1/2023			3/10/2023	5/31/2023	82	\$60.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148613
110148623	C3	110148613	2/1/2023			3/10/2023	5/31/2023	82	\$60.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148623
110148609	C3	110148592	2/22/2023			3/10/2023	5/31/2023	82	\$200.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148609
110148627	C3	110148609	2/22/2023			3/10/2023	5/31/2023	82	\$200.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148627
110148590	C3	0	2/1/2023			3/10/2023	5/31/2023	82	\$60.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148590
110148592	C3	0	2/22/2023			3/10/2023	5/31/2023	82	\$200.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148592
110148637	C4	0		3/1/2023	3/31/2023	4/10/2023	5/31/2023	51	\$1.26	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148637
110148624	C3	110148601	3/17/2023			4/10/2023	5/31/2023	51	\$10.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148624
110148601	C3	110148595	3/17/2023			4/10/2023	5/31/2023	51	\$10.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148601
110148607	C3	110148594	3/15/2023			4/10/2023	5/31/2023	51	\$30.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148607
110148628	C3	110148607	3/15/2023			4/10/2023	5/31/2023	51	\$30.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148628
110148594	C3	0	3/15/2023			4/10/2023	5/31/2023	51	\$30.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148594
110148595	C3	0	3/17/2023			4/10/2023	5/31/2023	51	\$10.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148595
110148638	C4	0		4/1/2023	4/30/2023	5/10/2023	5/31/2023	21	\$319.39	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148638
110148622	C3	110148600	4/5/2023			5/10/2023	5/31/2023	21	\$195.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148622
110148621	C3	110148599	4/28/2023			5/10/2023	5/31/2023	21	\$795.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148621
110148620	C3	110148598	4/24/2023			5/10/2023	5/31/2023	21	\$40.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148620

110148598 C3	110148597	4/24/2023	5/10/2023	5/31/2023	21	\$40.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148598
110148599 C3	0	4/28/2023	5/10/2023	5/31/2023	21	\$795.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148599
110148600 C3	110148596	4/5/2023	5/10/2023	5/31/2023	21	\$195.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148600
110148597 C3	0	4/24/2023	5/10/2023	5/31/2023	21	\$40.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148597
110148596 C3	0	4/5/2023	5/10/2023	5/31/2023	21	\$195.00	LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110148596

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Fri, 13 Oct at 1:53 AM) via Portal **Meta**
To Whom it May Concern --

It has come to my attention that the Lewis County Democratic Central Committee has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**.

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

On their most recent C1-pc forms (for both their exempt and non-exempt accounts), the Committee opted for the "full-reporting" option, requiring them to file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, the Lewis County Democratic Central Committee has failed on numerous occasions to do this. *See attached C1-pc documents.*

As you can see from this link, the Committee has been making multiple donations with their money, as recently as March of 2017:

<http://web.pdc.wa.gov/MvcQuerySystem/AdvancedSearch/ContributionsData?contributee=ALL&electionYear=ALL&dateFrom=&dateThru=&amountFrom=&amountThru=&committeeType=IGNORE&election=ALL&city=&state=&zip=&contributor=Lewis%20County%20Dem&employer=&occupation=&description>

This is clearly an active Committee that has hidden its financial activity from the public for a period spanning nearly half of a decade. The Lewis County Democratic Central Committee must immediately begin filing reports for the period of time they failed to file reports.

2) Failure to timely update C1-pc. (Violation of RCW 42.17A.205(4))

State law requires that any material change in information previously submitted in a statement of organization shall be reported to the commission within the ten days following the change.

On information and belief, numerous changes in the information included on the 2009 statements of organization have changed. This includes, but is not limited to, the officers of the committee and the committee treasurer.

These statements must be amended immediately to reflect accurate information.

The PDC should investigate the possibility that the Lewis County Democratic Central Committee committed the above violations 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 don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan



Political Committee Registration

C1PC
(1/2008)

RECEIVED

JUL 23 2009

Public Disclosure
Commission

Committee Name (Show entire official name.)

NON EXEMPT

Acronym: *LCDC*

LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE

Telephone: *(360) 330-5006*

Mailing Address

417 NORTH PEARL ST, SUITE #9

Fax: *(360) 985-2146*

City

County

Zip + 4

CENTRALIA

LEWIS

98531

E-mail: *treasurer@lewiscountydema*

NEW OR AMENDED REGISTRATION?

☐ NEW. Complete entire form.

☒ AMENDS previous report. Complete entire form.

COMMITTEE STATUS

☒ Continuing (On-going; not established in anticipation of any particular campaign election.)

☐ election year only. Date of general or special election: _____
(Year)

1. What is the purpose or description of the committee?

☒ **Bona Fide Political Party Committee** - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.

☐ **Ballot Committee** - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure:

Ballot Number FOR AGAINST

☐ ☐

☐ **Other Political Committee** - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name:

For single election-year only committees (not continuing committees): Is the committee supporting or opposing

(a) one or more candidates? ☐ Yes ☐ No If yes, attach a list of each candidate's name, office sought and political party affiliation.

(b) the entire ticket of a political party? ☐ Yes ☐ No If yes, identify the party:

2. Related or affiliated committees. List name, address and relationship.

☐ Continued on attached sheet.

3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.)

If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options.

☐ **MINI REPORTING**

Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor.

☒ **FULL REPORTING**

Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.

4. Campaign Manager's or Media Contact's Name and Address

Telephone Number:

()

5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes ___ No ___ See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet.

☐ Continued on attached sheet.

ANNE PIPER

PO BOX 397, SALKUM, WA 98582

Daytime Telephone Number:

(360) 388-0657

(360) 985-0657

6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details.

☐ Continued on attached sheet.

7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer."

☐ Continued on attached sheet.

8. Campaign Bank or Depository

STERLING BANK

Branch

CHEHALIS

City

CHEHALIS

9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address.

Street Address, Room Number, City where campaign books will be available for inspection

417 N. PEARL ST #9, CENTRALIA

In order to make an appointment, contact the campaign at (telephone, fax, e-mail): *(360) 985-0657, 360-985-2146 (fax)*

10. **Eligibility to Give to State Office Candidates:** During the 180 days prior to making a contribution to a state office candidate, your committee must have received contributions of \$10 or more from at least ten persons registered to vote in Washington State.

☒ A check here indicates your awareness of and pledge to comply with this provision. Absence of a check mark means your committee does not qualify to give to state office candidates (legislative and statewide executive candidates).

11. **Signature and Certification.** I certify that this statement is true, complete and correct to the best of my knowledge.


Committee Treasurer's Signature

Date

Anne Piper

7/23/09

SEE INSTRUCTIONS ON NEXT PAGE

 <p>PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40808 OLYMPIA WA 98504-0808 (360) 753-1111 Toll Free 1-877-601-2828</p>	<h2 style="margin: 0;">Political Committee Registration</h2>	<h1 style="margin: 0;">C1PC</h1> <p>(1/2008)</p>	<h1 style="margin: 0;">RECEIVED</h1> <p style="font-size: 1.2em;">JUL 23 2009</p> <p style="font-size: 0.8em;">Public Disclosure Commission</p>								
Committee Name (Show entire official name.) <i>EXEMPT</i> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <i>LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE</i> </div>		Acronym: <i>LC DCC</i> Telephone: <i>(360) 330-5006</i> Fax: <i>(360) 985-2146</i> E-mail: <i>treasurer@LEWISCOUNTYDEMOCRAT</i>									
Mailing Address <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <i>417 NORTH PEARL ST, SUITE #9</i> </div>		City: <i>CENTRALIA</i> County: <i>LEWIS</i> Zip + 4: <i>98531</i>									
NEW OR AMENDED REGISTRATION? <input type="checkbox"/> NEW. Complete entire form. <input checked="" type="checkbox"/> AMENDS previous report. Complete entire form.		COMMITTEE STATUS <input checked="" type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input type="checkbox"/> _____ election year only. Date of general or special election: _____ (Year)									
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<input type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure: _____ <table style="width: 100%; border: none;"> <tr> <td style="width: 70%;"></td> <td style="width: 15%; text-align: center;">Ballot Number</td> <td style="width: 10%; text-align: center;">FOR</td> <td style="width: 5%; text-align: center;">AGAINST</td> </tr> <tr> <td></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>					Ballot Number	FOR	AGAINST		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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SEE INSTRUCTIONS ON NEXT PAGE



**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 • Website: www.pdcc.wa.gov

March 4, 2019

Delivered electronically to sheila@teetering.org and lewiscodemocratswa@gmail.com

Subject: Complaint Filed by Glen Morgan, PDC Case 26735

Dear Sheila Johnson-Teeter:

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 Glen 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)(b), this letter serves as a formal written warning concerning the Lewis County Democratic Central Committee's (LCDCC) failure to comply with the requirement to report contributions and expenditures under the full reporting option under RCW 42.17A.235 and 42.17A.240 from 2010-2017, even though the LCDCC likely qualified to report under the Mini Reporting Option during those years. Staff expects the LCDCC to file timely and complete reports in future years in accordance with PDC laws and rules.

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 Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Alice Fiman
Compliance Officer

Endorsed by,
/s _____
Peter Lavallee
Executive Director



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

March 4, 2019

Delivered electronically to glen@wethegoverned.com

Subject: Complaint regarding Lewis County Democratic Central Committee, PDC Case 26735

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 27, 2017. Your complaint alleged the Lewis County Democratic Central Committee (LCDCC) may have violated: (1) RCW 42.17A.205 by failing to timely file an amended Committee Registration (C-1pc report) updating committee information; and (2) RCW 42.17A.235 and 42.17A.240 by failing to timely file complete and accurate Monetary Contributions reports (C-3 reports) and Summary Full Campaign Receipts & Expenditures reports (C-4 reports).

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response from Sheila Johnson-Teeter, LCDCC treasurer; the applicable campaign finance reports filed by the LCDCC; and the PDC's Open Data for contributions made by or received from the LCDCC.

Based on staff's review, we found the following:

- The LCDCC is a bona fide county political party organization that has been registered and reporting with the PDC dating back to at least 1996.
- In February 2018, the LCDCC treasurer died suddenly and unexpectedly.
- Current party officers are not able to determine why no reports were filed from 2010-2017.

- A C-4 report filed by the LCDCC was submitted electronically on September 7, 2010, disclosing no contribution or expenditure activities for the reporting period, and showing cumulative annual contributions totaling \$4,364 and cumulative expenditures totaling \$4,011.
- Based on available records, current LCDCC leadership believes the committee stayed within the contribution and expenditure limits of the mini reporting system during the period of non-reporting and could have properly requested the Mini Reporting Option and been relieved of filing C-3 and C-4 reports (although it did not in fact do so).
- Current treasurer Sheila Johnson-Teeter attended training at the PDC on July 18, 2018.

Allegation One: Violation of RCW 42.17A.235 and 42.17A.240 for failing to timely and accurately file C-3 and C-4 reports.

- The complaint alleged that the LCDCC failed to timely and accurately file C-3 and C-4 reports from 2010-2017.
- PDC staff's investigation and review determined the LCDCC filed C-3 and C-4 reports through September 2010. The next C-3 was filed June 19, 2018.

Allegation Two: Violation of RCW 42.17A.205 for failing to file an amended statement of organization (C-1pc) with updated information, including making an annual selection of a reporting option.

- The LCDCC filed for both its exempt and non-exempt accounts in July 2009, choosing the full reporting option.
- In November 2017, the LCDCC (non-exempt account) filed a C-1pc, choosing the Mini Reporting Option. The C-1pc was then amended in June 2018 and again in August 2018 with updated treasurer information.
- The LCDCC filed its annual C-1pc January 15, 2019, choosing mini reporting.

Based on these findings, including that the Committee likely qualified for the Mini Reporting Option from 2010 to 2017, staff has determined that in this instance, the failure to file an annual C-1pc between January 1 and January 31 of each year, selecting the Mini Reporting Option, does not amount to an actual violation warranting further investigation.

However, pursuant to WAC 390-37-060(1), the Lewis County Democratic Central Committee will receive a formal written warning concerning its failure to comply with the requirement to report contributions and expenditures under the full reporting option under RCW 42.17A.235 and 42.17A.240 from 2010-2017, even though it likely qualified to report under the Mini Reporting Option. The formal written warning will include staff's expectation that the Lewis County Democrat Central Committee file timely and complete reports in future years in accordance with PDC laws and rules. 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 Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Peter Lavalley
Executive Director