#### **Respondent Name**

Washington State Professional Business Woman PAC

#### **Complainant Name**

Glen Morgan

## **Complaint Description**

**Glen Morgan** reported via the portal

(Fri, 25 Aug 2023 at 8:34 PM)

To whom it may concern,

It has recently come to my attention, while surfing the PDC website, that the Washington State Professional Business Woman PAC has violated Washington State's Campaign Finance laws (**RCW 42.17A**). The specific Violations are as follows:

# 1) Illegally concealing the truth from the voters by filing reports egregiously late, until long after the election is over (Violation of RCW 42.17A.235, .240)

I've documented a number of shady political PACs in Washington over the past few years violating Washington State's Campaign Finance laws by concealing the truth about their contributions and expenditures by hiding both from the public for weeks, months, or years. This PAC, unfortunately, can now be added to the list of violators in this state.

I will note, for the record, that **the egregiously late report filing record for this month now belongs to this crew – you will note two reports over 1500 days late!** Normally, I would provide clarification on my color-coding for the egregiously late reports filed by this PAC, but every single one was egregiously late, and combined with this new monthly record for how long a PAC concealed the truth from the public, the evidence I've provided in the attached spreadsheet and the PDF file are obvious.

Unfortunately, late reporting, as illegal as that might be may not be the worst of it in this case.

# 2) Illegally concealing the identities of donors (Violation of RCW 42.17A.235, RCW 42.17A.240, Possible violation of RCW 42.17A.220(4))

At one point, this PAC decided to just call the donors "Several" which is not how the Washington State Campaign finance laws apply to contribution reporting (See **PDC C3 report # 110142251**, attached for staff reference). In addition to being years late in filing this report - even in this example, the \$552 contribution must be broken down by individual donors. If they have no record of who these donors are at this point, then this should be **treated as a violation of RCW 42.17A.220(4)** because it would be an anonymous contribution over the \$300 maximum threshold that was in effect at the time of this contribution, and the balance of \$252 must be forfeit to the state, per the statute (**See RCW 42.17A.220(4)**.

### 3) Failure to file any expenditure reports for several years. (Violation of RCW 42.17A.235, .240)

This is really just another piece in the puzzle of wholesale lawbreaking by this PAC. There were no C4 (expenditure) reports of any kind filed by this PAC between 11/1/2018 and 1/1/2022. None. Yet, political activity appears to have proceeded during this timeframe and the weird gap of zero reports, in light of the late reporting and illegal reporting detailed above indicates more than just the tip of the iceberg revealed above.

# 4) Apparent theft of campaign funds, misuse of campaign funds, disappearing campaign funds for likely personal use (Violation of RCW 42.17A.445)

Somehow this campaign "disappeared" \$4,230.19 between the C4 reporting period explained above in allegation #3. The last C4 report in 2018 (which was filed exceptionally late by years) claims that the campaign had \$4,230.19 in the account after expenses (See **PDC C4 Report # 110142253**, **attached for staff reference**). However, when the next egregiously late C4 expense report was filed picking up from when this last one supposedly left off – this secretive PAC claims that there were zero dollars in the bank (See **PDC C4 Report # 110138122**, also attached for staff reference). Where did the missing \$4,230.19 go?

Was it stolen by the campaign committee for themselves? Did the treasurer steal it? **Did they give secret** unreported contributions under the table to politicians? Was it misused illegally to fund someone's addiction to meth? What happened here?

Right now, we don't know the answer, and the crew running this PAC might not be talking. Either way, this is another great example where the PDC may be forced to subpoena the bank account records in an effort to resolve just what the heck happened here. Whatever it is, the public has been kept in the dark, and resolving this issue on top of the other allegations (and whatever sanctions the PDC may impose in this case – probably more than a naughty, naughty letter).

Let me know if you need more in this case, but I'm sure unravelling the mess will likely expose additional violations, but this is what jumped out at first glance at this Dark Money, secretive PAC.

Best Regards,

Glen Morgan

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

When a secretive Dark Money PAC like this one disappears and possibly steals over \$4,000 in campaign funds, conceals the truth about everything they did for years, and in the handful of cases where they bothered to file reports, decided to do so years after the election was over, the public has every right to know if anything this crew reported was real or true. This is a perfect example of a Dark Money PAC going full dark and concealing almost everything from the public for years

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

All evidence possible was compiled and attached as exhibits, but frankly, this PAC has concealed so much, the rest of the lawbreaking will come out in the investigation

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

Everyone even remotely associated with this PAC assuming they haven't fled the country yet to a country lacking an extradition treaty with America. Another excellent example of where subpoenas for bank records may be the only option to decipher what happened here

#### **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.



711 Capitol Way Suite 206 PO Box 40908 Olympia, WA 98504-0908 (360) 753-1111 Toll Free 1-800-601-2828

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4** 

WASHINGTON STATE BUSINESS AND PROFESSIONAL WOMAN PAC (BPWWA

PAC)

WASHINGTON STATE BUSINESS AND PROFESSIONAL WOMAN PAC -

02/28/2023 Final report: No

Report number: 110138122

Coverage: 01/01/2022 to

Reporting year: 2022

Date submitted: 03/08/2023

6014 105TH AVE NE KIRKLAND, WA 98033

**RECEIPTS** 

1. Previous total cash and in-kind contributions (last C4 line 8).		\$0.00
2. Cash received (Schedule A line 1).	\$495.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$495.00
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).		\$495.00
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).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$106.00	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$106.00
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).		\$106.00
CASH SUMMARY		
18. Cash on hand (Lines 8 - 17)		\$389.00
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)		\$389.00

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

Treasurer's name and date

Eldean Montgomery - 03/08/2023

# 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
09/06/2022	\$495.00				

## 2. TOTAL CASH RECEIPTS (LINE 2 OF C4):

\$495.00

## 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	\$20.00
05/22/2022	State Farm	Accounting, legal, regulatory compliance, etc.: Accounting, legal, regulatory compliance, etc.	\$86.00

\$106.00

4. TOTAL EXPENDITURES:

\$106.00



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# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4** 

WASHINGTON STATE BUSINESS AND PROFESSIONAL WOMAN PAC (BPWWA

PAC)

WASHINGTON STATE BUSINESS AND PROFESSIONAL WOMAN PAC -

Coverage: 01/01/2018 to

10/31/2018 Final report: No

Report number: 110142253

Reporting year: 2018

Date submitted: 04/10/2023

6014 105TH AVE NE KIRKLAND, WA 98033

**RECEIPTS** 

1. Previous total cash and in-kind contributions (last C4 line 8).		\$5,491.19
` '	¢0.00	\$5,491.19
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
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 $1 + 4 + 7$ ).		\$5,491.19
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).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$1,261.00	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$1,261.00
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).		\$1,261.00
CASH SUMMARY		
18. Cash on hand (Lines 8 - 17)		\$4,230.19
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)		\$4,230.19

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

Treasurer's name and date

Eldean Montgomery - 04/10/2023

# Schedule A: Cash Receipts and Expenditure Detail

1	CONTRIBILITIONS AND	OTHER CASH RECEIPTS	REDUBTED ON THE C3.
	CONTRIBUTIONS AND	, , , , , , , , , , , , , , , , , , , ,	REFURIED DIVIDE (3)

## 2. TOTAL CASH RECEIPTS (LINE 2 OF C4):

\$0.00

## 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	\$0.00
06/13/2018	State Farm Insurance	Accounting, legal, regulatory compliance, etc.: Accounting, legal, regulatory compliance, etc.	\$86.00
10/13/2018	Vote Ramos 1420 Gilman Blvd #2268 , Issaquah, WA 98027	Accounting, legal, regulatory compliance, etc.: Accounting, legal, regulatory compliance, etc.	\$500.00
10/13/2018	Dr Kim Schrier PO Box 2728 , Issaquah, WA 98027	Accounting, legal, regulatory compliance, etc.: Accounting, legal, regulatory compliance, etc.	\$675.00

\$1,261.00

4. TOTAL EXPENDITURES:

\$1,261.00



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# CASH RECEIPTS MONETARY CONTRIBUTIONS

**C3** 

WASHINGTON STATE BUSINESS AND PROFESSIONAL WOMAN PAC

(BPWWA PAC)

WASHINGTON STATE BUSINESS AND PROFESSIONAL WOMAN PAC -

Deposit date: 12/31/2018

Report number: 110142251 Amends

110141583

Submitted date: 04/10/2023

6014 105TH AVE NE KIRKLAND, WA 98033

#### 1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
	a. Anonymous	\$0.00	\$0.00
	<ul><li>b. Candidate's personal funds deposited in the bank (include candidate loans in</li><li>1c)</li></ul>	\$0.00	\$0.00
	c. Loans, notes, security agreements (Schedule L)	\$0.00	
	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

#### 2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$552.00

Corresponds to amount on line 1, Schedule A to C4, and itemized below

#### 3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
12/31/2018	several		\$552.00	N
				\$552.00

Date of deposit 12/31/2018

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

Treasurer's signature and date

Eldean Montgomery - 04/10/2023

# Report notes/attachments

simply trying to file reports in catch up monde

# Washington State Business and Professional Woman PAC - Completely Illegal reporting - mostly years late

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		Depo	sit		Projected	Submitted	Projected E	st. Total		
Report #	Type Ame	nds Date		From Through	<b>Due Date</b>		Days Late A	Activity	Filer	Hyperlink
									WASHINGTON STATE BUSINESS AND PROFESSIONAL	
110142251	. C3 110:	141583 12/3	1/2018		1/10/2019	4/10/2023	1551	\$552.00	) WOMAN PAC (BPWWA PAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110142251
									WASHINGTON STATE BUSINESS AND PROFESSIONAL	
110141583	C3	0 12/3	1/2018		1/10/2019	4/9/2023	1550	\$552.00	O WOMAN PAC (BPWWA PAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110141583
									WASHINGTON STATE BUSINESS AND PROFESSIONAL	
110138122	C4	0		1/1/2022 2/28/2023	2/10/2022	3/8/2023	391	\$106.00	O WOMAN PAC (BPWWA PAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110138122
									WASHINGTON STATE BUSINESS AND PROFESSIONAL	
110138116	C3	0 9/	6/2022		9/12/2022	3/8/2023	177	\$495.00	O WOMAN PAC (BPWWA PAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110138116