Respondent Name

Evan Merritt

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan reported via the portal

(Sat, 26 Aug 2023 at 11:56 PM)

To whom it may concern,

It has come to my attention that Evan Merritt, Snohomish County Fire Commissioner in Snohomish Fire Protection District #04, violated Washington State's campaign finance laws during his successful 2019 campaign. The details are as follows:

1) Illegally exceeding contribution limits for mini-reporting. Failing to convert to full reporting political committee. Concealing this information from the public (Violation of RCW 42.17A.205, RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-105, WAC 390-16-115, WAC 390-16-125)

On at least one occasion, this campaign accepted a contribution far in excess of the contribution limit from one donor to a mini-reporting campaign (See WAC 390-16-105(1)(b)). Specifically, this campaign received a \$500 contribution from IAFF Local 2781 PAC on 8/2/2019 (See PDC Report #110166407, attached for staff reference), and another \$1,000 contribution from this same PAC on 8/15/2019 (See PDC Report #110166407, attached for staff reference).

There is no evidence of this campaign refunding money to this PAC, nor is their evidence of this campaign changing filing status from mini-reporting to full reporting (**See WAC 390-16-125** for that process).

It appears likely that if this candidate was willing to so openly violate the mini-reporting requirements laid out by the Washington State Campaign Finance laws, there are probably more laws they broke as well. These violations were only uncovered when hard proof became available a few weeks ago when this secretive PAC finally came clean and late reported their secret contributions from 2019.

This is not a common violation for me to uncover. The rules around mini-reporting filers are flexible enough and generous enough that most violations are likely to occur unnoticed with few ways to verify the lawbreakers.

Let me know if you need anything else on this one. Seems pretty straightforward, but once you peel back the onion, not sure how many more layers you will find here.

Best Regards,

Glen Morgan

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

The public has a right to know who is funding political campaigns. This is particularly true when campaigns have exercised the privilege of using the min-reporting rules to avoid disclosure. When these rules are openly violated like this, they destroy the credibility of the mini-reporting campaign options for others, they invite skepticism of the entire process, and if candidates who openly violate these rules are not held accountable, then the system only descends into further lawlessness.

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

C4 from PAC showing illegal overlimit contribution is clearly attached as exhibit A. There may be more.

List of potential witnesses with contact information to reach them

The candidate, the treasurer, and the PAC are all good places to start

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.

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4

IAFF LOCAL 2781 POLITICAL ACTION COMMITTEE

P.O. BOX 12893 MILL CREEK, WA 98082 Coverage: 07/30/2019 to 08/31/2019

Final report: No

Report number: 110166407

Reporting year: 2019

Date submitted: 08/14/2023

RECEIPTS

2. Cash received (Schedule A line 1). \$443.00 3. In-kind contributions received (Line 1 schedule B). \$0.00 4. Total cash and in-kind contributions received this period (Lines 2 + 3). \$443.00 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). \$11,219.75 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). \$1,500.00 11. Cash expenditures (Line 3 schedule A). \$3,200.00 12. In-kind expenditures (Line 1 schedule B). \$0.00 13. Total cash and in-kind expenditures made this period (Lines 11 + 12). \$3,200.00 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). \$4,700.00 CASH SUMMARY \$6,519.75 Line 18 should equal your bank account balance(s) plus your petty cash balance.	1. Previous total cash and in-kind contributions (last C4 line 8).		\$10,776.75
4. Total cash and in-kind contributions received this period (Lines 2 + 3). 5. Loan principal repayments made (Line 2 schedule L). 6. Corrections (Lines 1 or 3 schedule C). 7. Net adjustments this period (Lines 5 + 6). 8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7). 9. Total pledge payments due (Line 2 schedule B). EXPENDITURES 10. Previous total cash and in-kind expenditures (Last C-4 line 17). 11. Cash expenditures (Line 3 schedule A). 12. In-kind expenditures (Line 1 schedule B). 13. Total cash and in-kind expenditures made this period (Lines 11 + 12). 14. Loan principal repayment made (Line 2 schedule L). 15. Corrections (Lines 2 + 3 schedule C). 16. Net adjustments this period (Lines 14 + 15). 17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16). CASH SUMMARY 18. Cash on hand (Lines 8 - 17) Line 18 should equal your bank account balance(s) plus your petty cash balance. 19. Liabilities: (Sum of loans and debts owed) \$0.00 \$0.00	2. Cash received (Schedule A line 1).	\$443.00	
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). \$11,219.75 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). \$1,500.00 11. Cash expenditures (Line 3 schedule A). \$3,200.00 12. In-kind expenditures (Line 1 schedule B). \$0.00 13. Total cash and in-kind expenditures made this period (Lines 11 + 12). \$3,200.00 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). \$4,700.00 CASH SUMMARY 18. Cash on hand (Lines 8 - 17) \$6,519.75 Line 18 should equal your bank account balance(s) plus your petty cash balance. 19. Liabilities: (Sum of loans and debts owed) \$0.00	3. In-kind contributions received (Line 1 schedule B).	\$0.00	
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19. Liabilities: (Sum of loans and debts owed) \$0.00	18. Cash on hand (Lines 8 - 17)		\$6,519.75
·	Line 18 should equal your bank account balance(s) plus your petty cash balance.		
20. Balance (Lines 18 - 19) \$6,519.75	19. Liabilities: (Sum of loans and debts owed)		\$0.00
	20. Balance (Lines 18 - 19)		\$6,519.75

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

Treasurer's name and date

COREY WENZEL - 08/14/2023

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
08/12/2019	\$443.00				

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

\$443.00

\$3,200.00

\$0.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$0.00
08/02/2019	Evan Merritt for Fire Comissioner , Snohomish, WA	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$500.00
08/02/2019	Todd Welch , Lake Stevens, WA	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$250.00
08/05/2019	Sam Wirsching	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$950.00
08/15/2019	Evan Merritt for Fire Comissioner , Snohomish, WA	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$1,000.00
08/15/2019	People for Anji Jorstad 9010 Market Place PMB 13 , Lake Stevens, WA 98258	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$250.00
08/27/2019	Shawn Frederick , Lake Stevens, WA	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$250.00

4. TOTAL EXPENDITURES: \$3,200.00