

Respondent Name
Campaign for Tribal Self Reliance Sponsored by the Tribal Gaming Association PAC
Complainant Name
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (Fri, 25 Aug 2023 at 11:57 AM) To whom it may concern,</p> <p>After reviewing some recent PDC filings, it has come to my attention that the Campaign for Tribal Self Reliance Sponsored by the Tribal Gaming Association PAC has committed significant violations of Washington State’s Campaign Finance laws (RCW 42.17A). The details are as follows:</p> <p>1) Failure to timely report contributions or expenditures (Violation of RCW 42.17A.235, RCW 42.17A.240)</p> <p>Clearly, I’ve been dropping the ball for not catching this PAC and filing a complaint earlier. I feel like I’m making up for past mistakes and oversights by filing this complaint now.</p> <p>I reviewed the history of late reports for this PAC, which requires a fairly extensive comparison between when the reports are due and when they were actually filed. A distressing pattern of behavior is uncovered by doing this simple research. It takes a lot of time, but once you’ve done it a few times, it gets more efficient every time you look. Clearly it might be more transparent for this PAC to start filing their reports in a timely manner, rather than concealing the truth from the public so long so often. This is an exceptionally well-funded PAC Sponsored by a Special Corporate Interest with unlimited funds and the ability to pay for the most expensive compliance team in the state. However, they decided to just break the law instead on a frequent basis.</p> <p>In a distressingly, all too often repeated pattern, this committee files reports late, concealing the truth from the public – often for months and even more than a year (56 reports, to be exact). Many of these reports have been filed weeks, months, and impressively sometimes over a year late, and many of them (I have highlighted these in red for PDC Staff to easily review) concealed significant financial transactions over \$1000 in totals for these egregiously late illegal reports. Many of them involved monthly transactions over \$100,000. In an effort to help PDC staff properly categorize the lateness of these reports, and the shocking sloppiness of this organization’s operation (how the heck did I miss this one before?), my attached spreadsheets provide a color-coded reference category for helpful sorting. Please keep in mind, so far, this is close to the worst violator I have uncovered for this type of violation in the state this month:</p> <ul style="list-style-type: none"> • Red (Extremely late – harming the public’s right to know) 46 extremely late reports – this was obviously most of them– up to 611 days late (over a year!). There really is no excuse for these extremely late reports to have concealed so much critical information from the public for so long. The sheer volume of these violations indicates no serious effort to comply with the law and in fact a concerted effort to mock the very concept of campaign finance reporting from the beginning. • Orange (Concerningly late – delaying the public’s right to know) 6 concerningly late reports – between 14 and 7 days late. Again, clearly not legal and not following the law. By itself, this would be enough of a violation to justify investigating this crew of lawbreakers.

- **Yellow (Sloppily late – delayed reporting) Only 4 sloppily late reports – up to 3 days late.** These could just be mistakes, sloppy bookkeeping, and written off as typical fumbling around by the treasurer, however, I’m including them in this report so that PDC staff can put this general widespread pattern of lawbreaking in proper context. If this shady group had only committed this type of violation, despite the strict liability requirements of **RCW 42.17A**, I probably wouldn’t file this complaint, but clearly this is just further evidence of no effort to really pay attention or comply with the law.

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.

I will reiterate here, for PDC staff edification – most of his PAC’s history they seem to be concealing the truth from the public most of the time for months and even over a year in many cases. This is unacceptable lawbreaking even under the current regime’s leniency for lawbreakers. I am sorta amazed this one escaped my notice in the past, but no time like the present to make up for my historic laziness in reporting this to the PDC.

Some notes on documenting these violations:

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 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 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.

I want to apologize to the PDC for missing this obvious and egregious level of lawbreaking by this PAC. There is no excuse for not filing this complaint earlier. Clearly, I will add this group to my list of frequent flier lawbreakers for regular review since they seem so intent on breaking the law in the future. I’m optimistic that with real consequences for this PAC this time, perhaps that can create some incentive for them to start following the law for a change in the future. PDC staff should keep in mind that if this PAC is so willing to botch all their historic filings, then the real question is how many “current” filings are accurate or flawed? Based on this documented recent history – probably most of them. It might be worth filing subpoenas on the bank records for this organization so that staff can verify the lack of compliance with primary sources since it is obvious you can’t trust the documents they file to be accurate or timely. The public has been done a grave disservice here for years now by this crew.

I hope the exhibits I have attached make the process of verifying this complaint simple and easy and this report can also serve as a tool for the lawbreakers in this crew to recognize their illegal activity and perhaps turn over a new leaf in the future and start following the law.

Let me know if you need anything else on this one.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?
Even MEGA dark money PACs like this one, which is entirely a creature of outside secretive corporate interests should follow the law. There is no excuse for them not to follow the law. They have ample resources to hire a full time compliance team, and yet they still concealed the truth from the public - often for over a year. The public has a right to know which politicians owe this PAC in the future.
List of attached evidence or contact information where evidence may be found
All attached in spreadsheet form - with direct links to the original late reports
List of potential witnesses with contact information to reach them
Everyone associated with this PAC.
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.

WA Campaign for Tribal Self Reliance PAC - Illegally concealing the truth from voters for years

Report #	Type	Amends	Deposit Date	From	Through	Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity	Filer	Hyperlink
110018265	C3	0	8/27/2019			9/2/2019	5/5/2021	611	\$2,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937569
110018267	C4	100929443		7/31/2019	8/31/2019	9/10/2019	5/5/2021	603	\$7,500.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937572
110018275	C4	100939051		9/1/2019	10/14/2019	10/15/2019	5/5/2021	568	\$2,213.41	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937577
110018277	C4	100954835		10/29/2019	11/30/2019	12/10/2019	5/5/2021	512	\$130,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937581
110017470	C3	100946878	11/20/2019			12/10/2019	4/30/2021	507	\$150,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4936735
110018296	C4	100956284		12/1/2019	12/31/2019	1/10/2020	5/5/2021	481	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937601
110018278	C3	100956283	12/31/2019			1/10/2020	5/5/2021	481	\$11.66	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937582
110018343	C4	100990348		1/1/2020	1/31/2020	2/10/2020	5/5/2021	450	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937646
110102495	C4	110078983		10/26/2021	11/30/2021	12/10/2021	7/26/2022	228	\$43,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110102495
110102500	C4	110078984		12/1/2021	12/31/2021	1/10/2022	7/26/2022	197	\$65,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110102500
100990348	C4	0		1/1/2020	1/31/2020	2/10/2020	8/6/2020	178	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4893353
110098896	C4	0		1/1/2022	5/31/2022	2/10/2022	7/12/2022	152	\$3,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110098896
100990349	C4	0		2/1/2020	2/29/2020	3/10/2020	8/6/2020	149	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4893354
100990350	C4	0		3/1/2020	3/31/2020	4/10/2020	8/6/2020	118	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4893355
110078983	C4	0		10/26/2021	11/30/2021	12/10/2021	4/6/2022	117	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110078983
110018345	C4	0		12/1/2020	12/31/2020	1/12/2021	5/5/2021	113	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937649
110018344	C3	0	12/31/2020			1/12/2021	5/5/2021	113	\$2.65	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4937648
110077547	C3	0	11/5/2021			12/10/2021	3/22/2022	102	\$110,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110077547
100990351	C4	0		4/1/2020	4/30/2020	5/11/2020	8/6/2020	87	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4893356
110078984	C4	0		12/1/2021	12/31/2021	1/10/2022	4/6/2022	86	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110078984
100880256	C4	100880205		9/1/2018	10/15/2018	10/16/2018	1/10/2019	86	\$104,500.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775432
100880205	C4	100880173		9/1/2018	10/15/2018	10/16/2018	1/10/2019	86	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775380
100880173	C4	100864655		9/1/2018	10/15/2018	10/16/2018	1/10/2019	86	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775350
100880257	C4	100880206		10/16/2018	10/29/2018	10/30/2018	1/10/2019	72	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775433

100880206	C4	100880177	10/16/2018	10/29/2018	10/30/2018	1/10/2019	72	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775381
100880177	C4	100877897	10/16/2018	10/29/2018	10/30/2018	1/10/2019	72	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775354
110143104	C4	0	1/1/2023	3/31/2023	2/10/2023	4/14/2023	63	\$1,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110143104
100990352	C4	0	5/1/2020	5/31/2020	6/10/2020	8/6/2020	57	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4893357
100877897	C4	0	10/16/2018	10/29/2018	10/30/2018	12/20/2018	51	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4772788
110128219	C4	110127309	9/1/2022	10/17/2022	10/18/2022	12/6/2022	49	\$173,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110128219
110127309	C4	110122332	9/1/2022	10/17/2022	10/18/2022	11/30/2022	43	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110127309
100954835	C4	100954833	10/29/2019	11/30/2019	12/10/2019	1/20/2020	41	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4858689
100954833	C4	100948029	10/29/2019	11/30/2019	12/10/2019	1/20/2020	41	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4858687
110098890	C3	0	5/31/2022		6/10/2022	7/12/2022	32	\$3,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110098890
100880259	C4	100880207	10/30/2018	11/30/2018	12/10/2018	1/10/2019	31	\$30,662.60	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775435
100880207	C4	100880180	10/30/2018	11/30/2018	12/10/2018	1/10/2019	31	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775382
100880180	C4	100877900	10/30/2018	11/30/2018	12/10/2018	1/10/2019	31	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4775357
110108535	C4	0	7/12/2022	7/25/2022	7/26/2022	8/25/2022	30	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110108535
110127310	C4	0	10/18/2022	11/30/2022	11/1/2022	11/30/2022	29	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110127310
100956284	C4	100954836	12/1/2019	12/31/2019	1/10/2020	2/7/2020	28	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4860200
100956283	C3	0	12/31/2019		1/10/2020	2/7/2020	28	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4860199
100993532	C4	0	7/14/2020	7/27/2020	7/28/2020	8/24/2020	27	\$20,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4896566
110108533	C3	0	7/26/2022		8/1/2022	8/25/2022	24	\$20,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110108533
100990353	C4	0	6/1/2020	7/13/2020	7/14/2020	8/6/2020	23	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4893358
110122327	C3	0	9/28/2022		10/3/2022	10/25/2022	22	\$55,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110122327
100946019	C4	0	10/15/2019	10/28/2019	10/29/2019	11/20/2019	22	\$1,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4848931
101011754	C4	0	9/1/2020	10/12/2020	10/13/2020	10/27/2020	14	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915076
100954836	C4	0	12/1/2019	12/31/2019	1/10/2020	1/20/2020	10	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4858690
100877900	C4	100877898	10/30/2018	11/30/2018	12/10/2018	12/20/2018	10	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4772791
100877898	C4	0	10/30/2018	11/30/2018	12/10/2018	12/20/2018	10	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4772789

110122332 C4	0	9/1/2022	10/17/2022	10/18/2022	10/25/2022	7	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110122332
100919271 C4	0	6/1/2019	7/15/2019	7/16/2019	7/23/2019	7	\$250.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4820027
100939051 C4	0	9/1/2019	10/14/2019	10/15/2019	10/18/2019	3	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4841004
100910479 C4	0	5/1/2019	5/31/2019	6/10/2019	6/12/2019	2	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4810933
100898905 C4	0	3/1/2019	3/31/2019	4/10/2019	4/12/2019	2	\$0.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4795520
100856060 C3	0	8/31/2018		9/3/2018	9/4/2018	1	\$265,000.00	CAMPAIGN FOR TRIBAL SELF RELIANCE BY WASHINGTON INDIAN GAMING ASSN	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4749943