Respondent Name

Melanie Morgan

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan reported via the portal

(Thu, 26 Oct 2023 at 1:44 AM)

To whom it may concern,

It has come to my attention that Washington State Representative Melanie Morgan, from the 29th Legislative District has committed violations of Washington State's campaign finance laws (**RCW 42.17A**). The details are as follows:

1) Complete failure to accurately report contributions or expenditures (Violation of RCW 42.17A.235, .240)

First, I wanted to clarify for the record, despite the same last name I do not believe that I am related to this politician. However, despite sharing a great last name, it appears this politician has broken the law by concealing the truth about her campaign's finances in her 2018 campaign. For example, I've attached a copy of a C4 report filed by her campaign on January 7, 2019 (See PDC C4 Report # 100879431, attached for staff reference). It clearly indicates a negative balance on Line 18 of \$12, 103.94, which is impossible because, as the report itself so clearly indicates – Line 18, MUST match the bank account balance at the time this report was filed. Clearly it did not.

Usually this indicates unreported contributions to the campaign that have not been disclosed to the public, but we can't know for sure until this politician is able to go back and report the truth about what they did with the missing cash stash.

For further reference verifying that money is missing here – see the first C4 filed for this politician's 2020 campaign (See PDC C4 Report # 100909128, attached for staff reference). Staff will notice that this campaign started with a zero balance. What happened to the missing \$12, 103.94? Who paid it? What else is wrong with this campaign?

The violation here is obvious and self-evident. The answer to the questions raised in this complaint are not so obvious. Clearly, this candidate must go back and resolve these questions.

Let me know if you need anything else here.

Best Regards,

Glen Morgan

(For Internal PDC Staff reference – based on my written testimony submitted to the PDC last month, I am counting this as complaint #11 for October)

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

The public has a right to know what happened to the missing \$12,000+. Where did it come from? What happened to it, and why did it vanish without being reported to the public?

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

C4 (expenditure reports) are attached

List of potential witnesses with contact information to reach them

Anyone associated with this politician's campaign at the time.

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(3/97)

PDC OFFICE USE 100909128

06-10-2019

Candidate or Committee Name (Do not abbreviate. Include full name)

(The	Frier	nds of Melan	ie Morgan)								
	ng Addres Box 3							City Lakew o	ood, WA		
Zip + 9849			Office Sought (Cand		Electi 2020	ion Da	ite				nmittees: During te an independent
	ort Period	From (last C	C-4) To (er	nd of period)	Final	Repor	rt?	expendit	<u>ure</u> (i.e., an expen	se not consid	lered a contribution)
Cove	ered	05/01/3	19 05	5/31/19	Yes	No	x	supporting	g or opposing a sta	ate or local ca	andidate?
REC	EIPTS				•			*See nex	t page	Yes	No
1.	Previous (if begin	s total cash and in k ning a new campai	kind contributions (From gn or calendar year, se	n line 8, last C-4) e instruction bool	klet)					··_\$	\$0.00
2.	Cash re	ceived (From line 2	, Schedule A)					···· <u>\$</u>	\$18,714.25	_	
3.	In kind o	contributions receive	ed (From line 1, Schedu	ule B)					\$0.00	_	
4.	Total ca	sh and in kind conti	ributions received this p	period (Line 2 plu	s 3)						\$18,714.25
5.	Loan pri	ncipal repayments	made (From line 2, Sch	nedule L)					\$0.00	_	
6.	Correcti	ons (From line 1 or	3, Schedule C)			. Show	/ + or ((-)	\$0.00	<u> </u>	
7.	Net adju	stments this period	(Combine line 5 & 6)						Show + or (-)		\$0.00
8.	Total ca	sh and in kind conti	ributions during campai	ign (Combine line	es 1, 4 & 7	')					\$18,714.25
			(From line 2, Schedule	e B)		\$0.	.00				
	ENDITUR	_									
10	If begin (If	s total cash and in k ning a new campai	kind expenditures (Fron gn or calendar year, se	n line 17, last C-4 e instruction boo	l) klet)						\$0.00
11	. Total ca	sh expenditures (Fr	om line 4, Schedule A)						\$1,041.9	<u>6</u>	
12	. In kind e	expenditures (goods	s & services) (From line	1, Schedule B).					\$0.0	0	
13	. Total ca	sh and in kind expe	enditures made this peri	iod (Line 11 plus	line 12)						\$1,041.96
14	. Loan pri	ncipal repayments	made (From line 2, Sch	nedule L)					\$0.0	<u>0</u>	
15	. Correcti	ons (From line 2 or	3, Schedule C)			. Show	/ + or ((-)	\$0.0	<u>0</u>	
16	i. Net adju	stments this period	(Combine lines 14 & 1	5)					Show + or (-)		\$0.00
17	'. Total ca	sh and in kind expe	enditures during campai	ign (Combine line	es 10, 13 a	and 16	6)				\$1,041.96
CAN	DIDATES	_	Name not	CASH SUMMA				47\			č17 <i>6</i> 72 20
		Won Lost	Unopposed on ballot						ur petty cash balance.]	· <u></u>	\$17,672.29
	ry election ral election			19. Liabilities:	(Sum of lo	ans a	nd del	ots owed)			\$0.00
Trea	surer's D	aytime Telephone	No.:	00 D-1 (2		1-6-20	<i>a</i> :	40 "			,
(2	06)335	-8815		Zu. Balance (Si	urpius or o	aericit)	(Line	ı & minus lii	ne 19)		\$17,672.29
			information herein and on	accompanying sch					orrect to the best of m	ny knowledge.	
Cano	didate's Si	gnature	Date		Treasure	er's Si	gnatur	e			Date
MEL	ANIE M	ORGAN	06	/10/19	Andv 1	Lo				C	06/10/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

A

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

(The Friends of Melanie Morgan) 05/01/19 1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted. Date of deposit Amount Date of deposit Amount Date of deposit Amount T									
1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.									
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits			
05/01/2019	\$18,714.25								
2. TOTAL CASH REC	CEIPTS			Enter al	so on line 2 of C4	\$ \$18,714.2			

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- If expenditures are <u>in-kind or earmarked contributions</u> to a candidate or committee or <u>independent expenditures</u> that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

- C Contributions (monetary, in-kind & transfers)
- I Independent Expenditures
- L Literature, Brochures, Printing
- B Broadcast Advertising (Radio, TV)
- N Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.)
- V Voter Signature Gathering

- P Postage, Mailing Permits
- S Surveys and Polls
- F Fundraising Event Expenses
- T Travel, Accommodations, Meals
- M Management/Consulting Services W Wages, Salaries, Benefits
- G General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

(Name and Address)	Code	and/or Description	Amount
			7
Expenses of \$50 or less	N/A	N/A	\$41.96
PRISM WASHINGTON 2222 OAK RD LYNNWOOD, WA 98087		Website and database setup	\$500.00
PRISM WASHINGTON 2222 OAK RD LYNNWOOD, WA 98087		Social media services	\$500.00
2 L	222 OAK RD YNNWOOD, WA 98087 RISM WASHINGTON 222 OAK RD	222 OAK RD YNNWOOD, WA 98087 RISM WASHINGTON 222 OAK RD	222 OAK RD YNNWOOD, WA 98087 PRISM WASHINGTON 222 OAK RD Social media services

Total from attached pages

\$0.00

Enter also on line 11 of C4

\$1,041.96

\$



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 100879431

01-07-2019

Candidate or Committee Name (Do not abbreviate. Include full name)

· · · · · · · · · · · · · · · · · · ·	ds of Melanie	Morgan)						
Mailing Address PO BOX 39063 LAKEWOOD,	WA, 98496					City Lakewood, WA		
Zip + 4 98496	Office Sought (Candi	,	Electi 2018	on Date		For PACs, Parties & Co		
Report Period From (last C-4	To (end	d of period)	Final	Report?	<u>e</u>	expenditure (i.e., an expen	se not d	considered a contribution)
Covered 12/01/18	3 12/	/31/18	Yes	No X	. <u>s</u>	supporting or opposing a sta	ate or lo	cal candidate?
RECEIPTS			ul.		*	See next page	Yes	No
Previous total cash and in kin (if beginning a new campaign	nd contributions (From or calendar year, see	line 8, last C-4) instruction book	det)				·_\$	\$48,513.00
2. Cash received (From line 2, S	Schedule A)					\$ \$0.00	_	
3. In kind contributions received	I (From line 1, Schedul	e B)				\$0.00	_	
4. Total cash and in kind contrib	outions received this pe	eriod (Line 2 plu	s 3)					\$0.00
5. Loan principal repayments ma	ade (From line 2, Sche	edule L)				\$0.00	_	
6. Corrections (From line 1 or 3,	, Schedule C)			Show +	or (-)	\$0.00	_	
7. Net adjustments this period (Combine line 5 & 6)					Show + or (-)		\$0.00
8. Total cash and in kind contrib	outions during campaig	n (Combine line	s 1, 4 & 7	·)				\$48,513.00
9. Total pledge payments due (F	From line 2, Schedule l	В)		\$0.0	0			
EXPENDITURES								
Previous total cash and in kin (If beginning a new campaign	nd expenditures (From n or calendar year, see	line 17, last C-4 instruction bool) klet)				·	\$57,416.94
11. Total cash expenditures (From	m line 4, Schedule A)					\$3,200.0	<u>0</u>	
12. In kind expenditures (goods &	services) (From line	1, Schedule B) .	•••••			\$0.0	Ω	
13. Total cash and in kind expend								\$3,200.00
14. Loan principal repayments ma	ade (From line 2, Sche	edule L)	•••••			\$0.0	<u>0</u>	
15. Corrections (From line 2 or 3,	, Schedule C)			Show +	or (-)	\$0.0	<u>0</u>	
16. Net adjustments this period (Combine lines 14 & 15	i)				Show + or (-)		\$0.00
17. Total cash and in kind expend	ditures during campaig	ın (Combine line	s 10, 13 a	and 16)				\$60,616.94
CANDIDATES ONLY		CASH SUMMA						
Won Lost U	Jnopposed on ballot)e(s) plus your petty cash balance.]	·	(\$12,103.94)
Primary election	H H	19. Liabilities: (Sum of lo	ans and	debts	owed)		\$0.00
Treasurer's Daytime Telephone N	lo.:							
(253)237-2487		20. Balance (Su	urplus or c	deficit) (L	ine 18	s minus line 19)		(\$12,103.94)
CERTIFICATION: I certify that the inf	formation herein and on a	ccompanying sch				rue and correct to the best of m	y knowl	edge.
Candidate's Signature	Date		Treasure	er's Signa	ature			Date
MELANIE MORGAN	01/	07/19	Doria	n Wali	ler			01/07/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

	`	,				
MELANIE MORGAN	(Friends of	Melanie Morgan)			12/01/18	12/31/18
1. CASH RECEIPTS	(Contributions) which	h have been reported on C3.	List each dep	oosit made since last C4	report was submitted.	
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
2. TOTAL CASH REC	CEIPTS			Enter al	so on line 2 of C4	\$0.00
CODES FOR CLA	SSIFYING EXPEND	ITURES: If one of the following	ng codes is us	ed to describe an expend	diture, no other descri	ption is generally

needed. The exceptions are:

- If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or 1) committee, identify the candidate or committee in the Description block;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE **DEFINITIONS** ON NEXT PAGE

- C Contributions (monetary, in-kind & transfers)
- I Independent Expenditures
- L Literature, Brochures, Printing
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- S Surveys and Polls
- F Fundraising Event Expenses
- T Travel, Accommodations, Meals
- M Management/Consulting Services
- W Wages, Salaries, Benefits
- G General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description		Amount
N/A	Expenses of \$50 or less	N/A	N/A		
12/07/18	GRACIE ANDERSON Tacoma, WA 98444		Campaign Assistance		\$200.00
12/17/18	ARCHWAY LLC PO Box 5953 Tacoma, WA 98415		Campaign Consunting		\$2,500.00
12/24/18	LESLIE HARBOUGH Tacoma, WA 98405		Campaign Assistance		\$500.00
		l .	Total from attached pag	es \$	\$0.00

Enter also on line 11 of C4

\$3,200.00