Respondent Name

18TH Leg Dist Demo Cent Comm

Complainant Name

Glenn Morgan

Complaint Description

Glen Morgan

reported via the portal (Mon, 26 Feb 2024 at 4:08 PM)

To whom it may concern,

It has come to my attention that the 18th Legislative District Democrats appears to have, once again, violated Washington State's campaign finance laws (**RCW 42.17A**). The details of these violations are as follows:

1) Attempt to conceal large contribution from the public, failure to report contribution (Violation of RCW 42.17A.240, .235)

While I was bored, I thought I would check out some PDC reports and since I had nothing better to do, I discovered the bizarre fact that it appears the 18th Legislative District Democrats have decided for some odd reason to conceal a \$2,000 contribution made to their organization by the Washington State Democrats on 8/23/2023 (See **PDC Report #110172389**, attached for staff reference). For some reason, this secretive dark money crew decided to conceal this contribution from the public and appear to not have reported it on any of their C3 contribution reports.

It has been a while since I looked at this group, but I obviously have been remiss in failing to review their books more recently. I would suggest that their bank records be subpoenaed by the PDC in order to better understand what else has been concealed from the public. Their bank records will obviously not match the line 18 reports on their C4 expenditure reports if they are concealing large checks like this one. Of course, they haven't filed any C4 or C3 reports for 2023, so everything is a black hole and a mystery here. I've attached their C1 for reference, as they updated it in 2022 for full reporting, even if they aren't following the law.

Let me know if you need anything more on this crew.

Best Regards,

Glen Morgan

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

The public has a right to know what shady dark money groups like this one are doing with their secret contributions. How are they influencing elections and why aren't they following the law? How come they are keeping it all secret?

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

Clearly referenced in the body of the complaint and attached as an exhibit

List of potential witnesses

Everyone listed on the C-1 report attached should be contacted. Obviously, their bank accounts should be subpoenaed as well since they have not reported anything.

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.



18TH LEG DIST DEMO CENT COMM NON EXEMPT

Po Box 1175 Vancouver, WA 98666-1175 chair@18thdems.org (253) 905-9876

Registration Filed

Bonafide District Non-Exempt

Democratic Party

Full Reporting

Submitted date: 11/23/2022

Certified by ellen.m.ino@gmail.com

Continuing 18THLD 674

Bank Information

Iq Credit Union

2 S 56th PI Suite 104

Ridgefield, WA 98642

To schedule books review contact ellen.m.ino@gmail.com

Officers

Charles Polacek

Chair
Po Box 1175
Vancouver, WA 98666-1175
chair@18thdems.org
(253) 905-9876

Lisa Henry

Secretary
Po Box 1175
Vancouver, WA 98666-1175
secretary@18thdems.org
(253) 905-9876

Linda Micheel

Vice Chair Po Box 1175 Vancouver, WA 98666-1175 vicechair@18thdems.org (253) 905-9876

Diana Perez

State Committeewoman Po Box 1175 Vancouver, WA 98666-1175 roseprez13@gmail.com 360-910-8493

Justin Oberg

State Committeeman Po Box 1175 Vancouver, WA 98666-1175 justin@pondata.com (360) 241-7418

Paulina Oberg

Ministerial Treasurer Po Box 1175 Vancouver, WA 98666-1175 treasurer@18thdems.org 360-726-1468

Attachments

Name Description



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 Democratic Committee - NonExempt

615 2nd Ave Suite 580 Seattle, WA Coverage: 07/25/2023 to 08/31/2023

Final report: No

Report number: 110172389 Reporting year: 2023

Date submitted: 09/11/2023

RECEIPTS

| 1. Previous total cash and in-kind contributions (last C4 line 8). | | \$1,536,038.33 |
|--|--------------|----------------|
| 2. Cash received (Schedule A line 1). | \$132,025.00 | |
| 3. In-kind contributions received (Line 1 schedule B). | \$21,566.00 | |
| 4. Total cash and in-kind contributions received this period (Lines 2 + 3). | | \$153,591.00 |
| 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). | | \$1,689,629.33 |
| 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). | | \$31,911.10 |
| 11. Cash expenditures (Line 3 schedule A). | \$46,378.01 | |
| 12. In-kind expenditures (Line 1 schedule B). | \$21,566.00 | |
| 13. Total cash and in-kind expenditures made this period (Lines 11 + 12). | | \$67,944.01 |
| 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 $10 + 13 + 16$). | | \$99,855.11 |
| CASH SUMMARY | | |
| 18. Cash on hand (Lines 8 - 17) | | \$1,589,774.22 |
| 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) | | \$1,589,774.22 |

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

Treasurer's name and date

David Kim - 09/11/2023

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 |
|--------------|-------------|--------------|------------|--------------|--------------|
| 07/27/2023 | \$25.00 | 08/09/2023 | \$30.00 | 08/24/2023 | \$35.00 |
| 07/27/2023 | \$30.00 | 08/10/2023 | \$5,000.00 | 08/25/2023 | \$100,000.00 |
| 08/02/2023 | \$20,000.00 | 08/15/2023 | \$20.00 | 08/28/2023 | \$20.00 |
| 08/03/2023 | \$110.00 | 08/17/2023 | \$20.00 | 08/28/2023 | \$4,000.00 |
| 08/03/2023 | \$10.00 | 08/17/2023 | \$100.00 | 08/29/2023 | \$25.00 |
| 08/07/2023 | \$2,500.00 | 08/23/2023 | \$100.00 | | |

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

\$132,025.00

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 | \$30.32 |
| 08/02/2023 | Paragon 3901 Centerview Dr Ste W , Chantilly, VA 20151-3229 | G Bank Fees | \$27.50 |
| 08/23/2023 | 10th District Democrats PO Box 1473 , Stanwood, WA 98292-1473 | C Contribution | \$2,000.00 |
| 08/23/2023 | 11th District Democrats 17917 162nd PI SE , Renton, WA 98058-9166 | C Contribution | \$500.00 |
| 08/23/2023 | 18th Legislative District Democrats 2125 Seaview St West 2125 Ave W , University Place, WA 98466 | C Contribution | \$2,000.00 |
| 08/23/2023 | 19th LD Democrats PO Box 823 , Montesano, WA 98563-0823 | C Contribution | \$500.00 |
| 08/23/2023 | 23rd Legislative District Democrats 7245 Cornell Ct Northwest 7245 Ct NW , Bremerton, WA 98311 | C Contribution | \$2,000.00 |
| 08/23/2023 | 27th District Democrats PO Box 1532 , Tacoma, WA 98401-1532 | C Contribution | \$4,000.00 |
| 08/23/2023 | 31st Legislative District Democrats PO Box 161 , Sumner, WA 98390-0030 | C Contribution | \$564.00 |
| 08/23/2023 | 33rd District Democratic Organization PO Box 90608 , Bellevue, WA 98009 | C Contribution | \$2,000.00 |
| 08/23/2023 | 39th LD Democratic Party Organization 4405 95th Northeast 4405 - St NE , Marysville, WA 98270 | C Contribution | \$2,000.00 |
| 08/23/2023 | 40th LD Democrats 422 N Barker St , Mount Vernon, WA 98273-3118 | C Contribution | \$450.00 |
| 08/23/2023 | 49th Legislative District Democrats 7010 NE 56th St , Vancouver, WA 98661-3639 | C Contribution | \$2,000.00 |
| 08/23/2023 | Clallam County Democratic Central Committee PO Box 2454, Port Angeles, WA 98362-0314 | C Contribution | \$2,000.00 |
| | . <u> </u> | | \$46,378.01 |

| | PO Box 1423 , Aberdeen, WA 98520-0299 | | |
|------------|--|-------------------------------------|-------------|
| 08/23/2023 | Jefferson County Democrats PO Box 85 , Port Townsend, WA 98368-0085 | C Contribution | \$1,300.00 |
| 08/23/2023 | Kittitas County Democratic Central Committee 1106 E 3rd Ave , Ellensburg, WA 98926-3525 | C Contribution | \$1,991.19 |
| 08/23/2023 | Klickitat County Democratic Central Committee PO Box 154 , Lyle, WA 98635-0004 | C Contribution | \$500.00 |
| 08/23/2023 | Mason County Democratic Central Committee PO Box 1272 , Shelton, WA 98584-0952 | ic Central Committee C Contribution | |
| 08/23/2023 | NCW Democrats C Contribution 1 S Chelan Ave Bsmt STE , Wenatchee, WA 98801-2202 | | \$1,060.00 |
| 08/23/2023 | Skagit County Democratic Party 1919 Tweed PI, Anacortes, WA 98221-3132 | C Contribution | \$2,000.00 |
| 08/23/2023 | Snohomish County Democrats 2720 Rucker Ave Ste 101 , Everett, WA 98201-3464 | C Contribution | \$2,000.00 |
| 08/23/2023 | Spokane County Democratic Central Committee 321 S Cedar St , Spokane, WA 99201-7029 | C Contribution | \$5,000.00 |
| 08/23/2023 | Walla Walla Democratic Central Committee PO Box 1323 , Walla Walla, WA 99362-0024 | C Contribution | \$2,000.00 |
| 08/23/2023 | Whatcom County Democrats PO Box 3095 , Bellingham, WA 98227-3095 | C Contribution | \$4,000.00 |
| 08/23/2023 | Yakima Democratic Club 1607 S 1st Ave , Yakima, WA 98902-6005 | C Contribution | \$2,000.00 |
| | | | \$46,378.01 |

Purpose of expense

and/or description

C Contribution

C Contribution

Cash

\$1,955.00

\$500.00

\$46,378.01

Vendor or recipient

(Name and address)

Cowlitz County Democratic Central Committee

536 Oregon Way , Longview, WA 98632-1536

Grays Harbor Democratic Committee

Date paid

08/23/2023

08/23/2023

4. TOTAL EXPENDITURES:

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

1. IN-KIND CONTRIBUTIONS RECEIVED:

| Date Received | Contributor | Employer/Occupation | Description | Amount |
|---------------|--|---|-----------------------------------|--|
| 08/16/2023 | Empowering Resources LLC 24 A Trolley Sq # 1223, Wilmington, DE 19806-3334 | | Training Fees | Fair market value: \$3,216.00 Aggregate total (N): \$3,216.00 |
| 07/31/2023 | Eric Schmidt 1600 Amphitheatre Pkwy , Mountain View, CA 94043- 1351 | CEO, Hillspire LLC Mountain View, CA | Stac Labs, Inc - Data Software | Fair market value: \$18,350.00 Aggregate total (N): \$18,350.00 |

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period

Report notes/attachments

In Kind Contributions