

<b>Respondent Name</b>
Cowlitz County Democratic Central Committee
<b>Complainant Name</b>
Glen Morgan
<b>Complaint Description</b>
<p><u><a href="#">Glen Morgan</a></u>  reported via the portal  11 days ago (Mon, 26 Feb 2024 at 3:37 PM)  To whom it may concern,</p> <p>It has come to my attention that the Cowlitz County Democratic Central Committee PAC appears to have, once again, violated Washington State's campaign finance laws (<b>RCW 42.17A</b>). The details of these violations are as follows:</p> <p><b>1) Attempt to conceal large contribution from the public, failure to report contribution (Violation of RCW 42.17A.240, .235)</b></p> <p>While I was browsing the PDC website this afternoon, trying to kill some time at Starbucks, I discovered the bizarre fact that it appears the Cowlitz County Democrats have decided for some odd reason to conceal a \$1,955 contribution made to their organization by the Washington State Democrats on 8/23/2023 (See <b>PDC Report #110172389, attached for staff reference</b>). 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.</p> <p>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.</p> <p>This group has a long history of violating Washington State's campaign finance laws when they appear to believe nobody is watching. I caught them breaking a variety of campaign finance laws back in 2017 (See <b>PDC Enforcement Case #26715, attached for staff reference</b>). There were no penalties issued by the PDC at that time for those violations. It appears that the PDC will have to make the penalty for this violation a bit more substantial before this crew appears to become willing to follow the law.</p> <p>Let me know if you need anything more on this crew.</p> <p>Best Regards,</p> <p>Glen Morgan</p>
<b>What impact does the alleged violation(s) have on the public?</b>
The public has a right to know when secretive dark money groups like this one attempt to conceal large infusions of dark money from other sources. Why would they hide this from the public?
<b>List of attached evidence or contact information where evidence may be found</b>
Referenced in the body of the complaint, and attached for reference
<b>List of potential witnesses</b>
Everyone involved or associated with this PAC. Their bank should also be contacted and subpoenaed to see what else is missing.
<b>Certification (Complainant)</b>
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.



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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 Pl 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
			<b>\$46,378.01</b>

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
08/23/2023	Cowlitz County Democratic Central Committee 536 Oregon Way , Longview, WA 98632-1536	C Contribution	\$1,955.00
08/23/2023	Grays Harbor Democratic Committee PO Box 1423 , Aberdeen, WA 98520-0299	C Contribution	\$500.00
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	C Contribution	\$2,000.00
08/23/2023	NCW Democrats 1 S Chelan Ave Bsmt STE , Wenatchee, WA 98801-2202	C Contribution	\$1,060.00
08/23/2023	Skagit County Democratic Party 1919 Tweed Pl , 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**

4. TOTAL EXPENDITURES:

**\$46,378.01**

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

## **File a Formal Complaint - Glen Morgan**

[Glenmorgan89](#) reported (Fri, 13 Oct at 1:32 AM) via Portal **Meta**  
To Whom it May Concern --

It has come to my attention that the Cowlitz County Democratic Central Committee have habitually and willfully committed frequent and multiple violations of **RCW 42.17A**.

### **1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)**

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, the Cowlitz County Democratic Central Committee has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

### **2) Failure to accurately, timely report debt. (Violation of RCW 42.17A.240 (8), see WAC 390-05-295)**

State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days be reported on form C4. Per **WAC 390-05-295**, this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service.

The Cowlitz County Democratic Central Committee illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

**3) Failure to properly break down, describe expenses.  
(Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)**

State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with **WAC 390-16-037** and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4.

The Cowlitz County Democratic Central Committee illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that the Cowlitz County Democratic Central Committee committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately. Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan





### Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		1224		As of --		10/13/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	PURCELL MARK	8/30/2016	\$ 800.00	2 MONTHS OFFICE RENTAL	Failure to identify subvendor.	100723483	396
2	MCLAIN PAUL	8/1/2016	\$ 60.00	INSURANCE FOR COWLITZ COUNTY FAIR BOOTH	Failure to identify subvendor.	100723483	396
3	MCLAIN PAUL	9/22/2016	\$ 300.00	REIMBURSEMENT FOR SIGNS, BUTTONS, AND BUMPER STICKERS	Failure to identify subvendor, failure to identify number of items printed.	100728436	360
4	MCLAIN PAUL	2/9/2017	\$ 87.45	LASER PRINTER POSTCARDS FOR SAVE THE DATE CARDS FOR GIVE EM HELL HARRY	Failure to identify subvendor.	100752276	217
5	CORRIE TWYLLA S	2/3/2017	\$ 93.70	ENVELOPES AND INK FOR GIVE EM HELL HARRY MAILING	Failure to identify subvendor, failure to identify number of items printed.	100752276	217
6	ELDRIDGE DEBRA	5/24/2017	\$ 317.18	ITEMS BOUGHT FOR GIVE EM HELL DINNER & AUCTION	Failure to identify subvendor.	100768971	125
7	CORRIE TWYLLA S	6/2/2017	\$ 44.31	INK FOR PRINTING	Failure to identify subvendor.	100774730	94
8	CORRIE TWYLLA S	6/2/2017	\$ 195.61	AUCTION ITEMS FOR GIVE EM HELL HARRY	Failure to identify subvendor.	100774730	94
9	CORRIE TWYLLA S	6/2/2017	\$ 206.69	AUCTION ITEMS FOR GIVE EM HELL HARRY	Failure to identify subvendor.	100774730	94
10	MCLAIN PAUL	6/27/2017	\$ 172.94	PRINTING BOOKLETS FOR GIVE EM HELL HARRY AUCTION	Failure to identify subvendor, failure to identify number of items printed.	100774730	94
11	RICHIE MEGAN	6/24/2017	\$ 81.76	DECORATIONS FOR GIVE EM HELL HARRY AUCTION	Failure to identify subvendor.	100774730	94
12	THOMPSON MELISSA	6/29/2017	\$ 229.07	AUCTION ITEMS PURCHASED FOR GIVE EM HELL HARRY AUCTION	Failure to identify subvendor.	100774730	94
13	CORRIE TWYLLA S	6/29/2017	\$ 50.00	INSURANCE FOR GO 4TH BOOTH	Failure to identify subvendor.	100774730	94
14	CORRIE TWYLLA S	6/29/2017	\$ 50.00	INSURANCE FOR COWLITZ COUNTY FAIR BOOTH	Failure to identify subvendor.	100774730	94
15	THOMPSON MELISSA	8/21/2017	\$ 19.95	REGISTRATION FOR GREATER GIVING FUNDRAISING SEMINAR	Failure to identify subvendor.	100786965	32
16	THOMPSON MELISSA	8/21/2017	\$ 30.05	GAS & DINNER FROM TRAVELING TO MERCER ISLAND FOR THE SEMINAR	Failure to identify subvendor.	100786965	32
Total			\$ 2,738.71				

## Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 93

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Lat
1	100672840	C3	N	11/9/2015	12/10/2015	12/29/2015	19
2	100676291	C4	Y		1/11/2016	1/27/2016	16
3	100723482	C3	N	9/14/2016	9/19/2016	10/1/2016	12
4	100733717	C3	N	10/19/2016	10/24/2016	11/3/2016	10
5	100728392	C3	N	10/5/2016	10/10/2016	10/18/2016	8
6	100768967	C3	N	6/2/2017	6/5/2017	6/12/2017	7
7	100738747	C4	N		12/12/2016	12/18/2016	6
8	100769551	C3	N	6/9/2017	6/12/2017	6/16/2017	4
9	100756389	C4	N		4/10/2017	4/13/2017	3
10	100733720	C4	N		11/1/2016	11/3/2016	2
11	100768971	C4	N		6/10/2017	6/12/2017	2
12	100690557	C4	N		4/11/2016	4/12/2016	1
13	100695197	C4	N		5/10/2016	5/11/2016	1
14	100702343	C3	N	6/10/2016	6/13/2016	6/14/2016	1
15	100707755	C3	N	7/9/2016	7/11/2016	7/12/2016	1

e

## Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		2936		As of -- 10/13/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.		Approx. days late
1	SUMMERLAND CATERING SERVICES	11/8/2016	\$ 1,000.00	FOOD FOR ELECTION NIGHT PARTY RENT FOR STORAGE	This should have been reported as debt on the 7 day pre-general C4.		346
2	H & H STORAGE	2/1/2016	\$ 600.00	UNIT	This should have been reported as debt on the C4 covering the time period of January 2016.		611
3	GREATER GIVING	1/3/2017	\$ 795.00	RENEWAL ONLINE SERVICES FOR GIVE EM HELL HARRY AUCTION	This should have been reported as debt on the C4 covering the time period of December 2016.		276
4	THE DAILY NEWS	3/9/2016	\$ 695.00	4 ADS FOR PRESIDENTIAL PRECINCT CAUCUSES	This should have been reported as debt on the C4 covering the time period of February 2016.		582
5	PURCELL MARK	8/30/2016	\$ 800.00	2 MONTHS OFFICE RENTAL	This should have been reported as debt on the 7-day pre-primary C4.		444
6	MCLAIN PAUL	9/22/2016	\$ 300.00	REIMBURSEMENT FOR SIGNS, BUTTONS, AND BUMPER STICKERS	This should have been reported as debt on the post-primary C4.		396
7	H & H STORAGE	1/16/2017	\$ 660.00	STORAGE UNIT RENEWAL	This should have been reported as debt on the C4 covering the time period of December 2016.		276
8	ELDRIDGE DEBRA	5/24/2017	\$ 317.18	ITEMS BOUGHT FOR GIVE EM HELL DINNER & AUCTION	This should have been reported as debt on the C4 covering the time period of April 2017.		156
9	COWLITZ REGIONAL CONFERENCE CENTER	6/13/2017	\$ 9,797.45	RENTAL SPACE & CATERING FOR GIVE EM HELL HARRY AUCTION	This should have been reported as debt on the C4 covering the time period of May 2017.		125
Total			\$ 14,964.63				