

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Thu, 2 Nov at 1:29 AM) via Portal Meta
To Whom it May Concern --

It has come to my attention that Jesse Johnson, a candidate for the Federal Way City Council has habitually and willfully committed frequent and multiple violations of **RCW 42.17A** during his current campaign. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

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, Jesse Johnson has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

In addition to the violations identified in the exhibit, Johnson has illegally neglected to report the following:

Expenditure/in-kind contribution/debt for professional photography and mailing lists.

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.

Jesse Johnson 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.

Jesse Johnson illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

4) Illegal acceptance of over-limit contribution from SEIU 1199. (Violation of RCW 42.17A.405)

According to his campaign records, Johnson received \$2000 (both \$1000 contributions earmarked for the general election) from SEIU 1199 on 10/25/2017. This contribution is \$1000 over the applicable contribution limit.

This money must be returned immediately.

The PDC should investigate the possibility that Jesse Johnson 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.

Please note, I have provided all three attachments in both Excel and PDF file formats as requested by PDC staff

Best Regards,

Glen Morgan

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 83

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100795058	C4	N		9/11/2017	10/22/2017	41
2	100771544	C4	N		6/10/2017	6/27/2017	17
3	100797740	C4	N		10/17/2017	10/31/2017	14
4	100779469	C3	N	7/13/2017	7/17/2017	7/28/2017	11

Exhibit B -- Illegal failure to timely report Debt

imate Cumulative Days Late --		197	As of -- 11/2/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	BILLY MCHALE'S	6/11/2017	\$ 257.48	FOOD FOR KICK-OFF	This should have been reported as debt on the C4 covering the time period of May 2017.	145
2	FEDERAL WAY MIRROR	6/29/2017	\$ 610.00	AD IN FEDERAL WAY MIRROR	This should have been reported as debt on the C4 covering the time period of May 2017.	145
3	WINPOWER	6/8/2017	\$ 435.00	REMIT ENVELOPES	This should have been reported as debt on the C4 covering the time period of May 2017.	145
4	WINPOWER	6/8/2017	\$ 1,400.00	LITERATURE	This should have been reported as debt on the C4 covering the time period of May 2017.	145
5	WINPOWER	6/8/2017	\$ 1,560.00	YARD SIGNS	This should have been reported as debt on the C4 covering the time period of May 2017.	145
6	WINPOWER	6/8/2017	\$ 335.00	WEBSITE FOR CAMPAIGN	This should have been reported as debt on the C4 covering the time period of May 2017.	145
7	CAPITOL CITY PRESS	10/16/2017	\$ 2,083.48	MAILER POSTAGE	This should have been reported on the post-primary C4.	52
8	SOUND PUBLISHING	10/16/2017	\$ 425.00	FEDERAL WAY MIRROR AD	This should have been reported on the post-primary C4.	52
9	SOUND PUBLISHING	10/16/2017	\$ 425.00	FEDERAL WAY MIRROR AD	This should have been reported on the post-primary C4.	52
10	VILMA'S SIGNS	9/1/2017	\$ 467.50	T-SHIRTS	This should have been reported on the post-primary C4.	52
11	WINPOWER	10/16/2017	\$ 4,902.52	MAILER/LITERATURE	This should have been reported on the post-primary C4.	52
12	WINPOWER	10/16/2017	\$ 4,000.00	DIGITAL ADVERTISING	This should have been reported on the post-primary C4.	52
13	WINPOWER	10/16/2017	\$ 625.00	YARD SIGNS	This should have been reported on the post-primary C4.	52
14	WINPOWER	10/16/2017	\$ 450.00	LITERATURE	This should have been reported on the post-primary C4.	52
15	WINPOWER	10/16/2017	\$ 625.00	YARD SIGNS	This should have been reported on the post-primary C4.	52
Total			\$ 18,600.98			

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		275	As of --		11/2/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	FINE ALLISON	5/16/2017	\$ 129.60	BUSINESS CARDS	Failure to identify number of items printed, subvendor.	100771544	145
2	BUTTONSMITH INC.	6/7/2017	\$ 55.00	BUTTONS	Failure to identify number of items printed.	100772835	114
3	MOODY JAMES	6/11/2017	\$ 40.60	KICK-OFF SUPPLIES	Failure to identify subvendor.	100772835	114
4	WINPOWER	6/8/2017	\$ 435.00	REMIT ENVELOPES	Failure to identify number of items printed, subvendor.	100772835	114
5	WINPOWER	6/8/2017	\$ 1,400.00	LITERATURE	Failure to identify number of items printed, subvendor.	100772835	114
6	WINPOWER	6/8/2017	\$ 1,560.00	YARD SIGNS	Failure to identify number of items printed, subvendor.	100772835	114
				WEBSITE FOR			
7	WINPOWER	6/8/2017	\$ 335.00	CAMPAIGN	Failure to identify subvendor.	100772835	114
8	30TH DISTRICT DEMOCRATS	10/16/2017	\$ 250.00	MAILER	Failure to identify number of items printed, subvendor.	100797740	16
				FOOD DONATED FOR			
9	JOHNSON KEN	9/11/2017	\$ 12.95	EVENT	Failure to identify subvendor.	100797740	16
10	JOHNSON KEN	9/13/2017	\$ 2.09	FOOD FOR EVENT	Failure to identify subvendor.	100797740	16
				FOOD/BEVERAGE FOR			
11	JOHNSON KEN	9/13/2017	\$ 117.91	EVENT	Failure to identify subvendor.	100797740	16
				FOOD/BEVERAGES			
12	JOHNSON KEN	9/16/2017	\$ 50.60	FOR EVENT	Failure to identify subvendor.	100797740	16
				FOOD DONATED FOR			
13	JOHNSON LU	9/11/2017	\$ 12.95	EVENT	Failure to identify subvendor.	100797740	16
14	JOHNSON LU	9/13/2017	\$ 2.08	FOOD FOR EVENT	Failure to identify subvendor.	100797740	16
				FOOD/BEVERAGE FOR			
15	JOHNSON LU	9/13/2017	\$ 117.90	EVENT	Failure to identify subvendor.	100797740	16
				FOOD/BEVERAGES			
16	JOHNSON LU	9/16/2017	\$ 50.59	FOR EVENT	Failure to identify subvendor.	100797740	16
17	VILMA'S SIGNS	9/1/2017	\$ 467.50	T-SHIRTS	Failure to identify number of items printed.	100797740	16
18	WINPOWER	10/16/2017	\$ 4,902.52	MAILER/LITERATURE	Failure to identify number of items printed, subvendor.	100797740	16
19	WINPOWER	10/16/2017	\$ 4,000.00	DIGITAL ADVERTISING	Failure to identify subvendor.	100797740	16
20	WINPOWER	10/16/2017	\$ 625.00	YARD SIGNS	Failure to identify number of items printed, subvendor.	100797740	16
21	WINPOWER	10/16/2017	\$ 450.00	LITERATURE	Failure to identify number of items printed, subvendor.	100797740	16
22	WINPOWER	10/16/2017	\$ 625.00	YARD SIGNS	Failure to identify number of items printed, subvendor.	100797740	16
Total			\$ 15,642.29				