

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Thu, 26 Oct at 3:06 PM) via Portal Meta
To Whom it May Concern --

It has come to my attention that Larry Seaquist, during his failed 2016 campaign for the 26th Legislative District has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. 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, Larry Seaquist 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.

Larry Seaquist 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.

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

The PDC should investigate the possibility that Larry Seaquist 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

(Please note, in an effort to help staff by converting these files to PDF as requested, I have provided them as PDF files, but because some of these files are more difficult to read in a PDF document, I have also provided them as excel files for backup in case staff chooses to convert the original file differently)

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 1596

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100742104	C4	Y		6/10/2016	1/19/2017	223
2	100742097	C4	Y		7/12/2016	1/19/2017	191
3	100742098	C4	Y		7/26/2016	1/19/2017	177
4	100739405	C4	Y		7/26/2016	1/2/2017	160
5	100742099	C4	Y		9/12/2016	1/19/2017	129
6	100739406	C4	Y		9/12/2016	1/2/2017	112
7	100724747	C3	Y	6/16/2016	6/20/2016	10/8/2016	110
8	100742100	C4	Y		10/18/2016	1/19/2017	93
9	100742101	C4	Y		11/1/2016	1/19/2017	79
10	100739407	C4	Y		10/18/2016	1/2/2017	76
11	100739408	C4	Y		11/1/2016	1/2/2017	62
12	100742102	C4	Y		12/12/2016	1/19/2017	38
13	100739409	C4	Y		12/12/2016	1/2/2017	21
14	100733767	C4	Y		10/18/2016	11/4/2016	17
15	100705500	C3	Y	6/16/2016	6/20/2016	7/5/2016	15
16	100734787	C3	N	10/22/2016	10/24/2016	11/8/2016	15
17	100724746	C3	Y	9/22/2016	9/26/2016	10/8/2016	12
18	100742103	C4	Y		1/10/2017	1/19/2017	9
19	100734788	C3	N	10/25/2016	10/31/2016	11/8/2016	8
20	100734790	C3	N	10/27/2016	10/31/2016	11/8/2016	8
21	100734789	C3	N	10/26/2016	10/31/2016	11/8/2016	8
22	100734857	C4	Y		11/1/2016	11/8/2016	7
23	100734429	C4	Y		11/1/2016	11/7/2016	6
24	100724745	C3	Y	9/29/2016	10/3/2016	10/8/2016	5
25	100733745	C4	N		11/1/2016	11/4/2016	3
26	100733773	C4	Y		11/1/2016	11/4/2016	3
27	100728981	C4	Y		10/18/2016	10/20/2016	2
28	100728751	C4	Y		10/18/2016	10/19/2016	1
29	100734792	C3	N	10/31/2016	11/7/2016	11/8/2016	1
30	100734793	C3	N	10/31/2016	11/7/2016	11/8/2016	1

31	100734791	C3	N	10/31/2016	11/7/2016	11/8/2016	1
32	100734794	C3	N	11/2/2016	11/7/2016	11/8/2016	1
33	100734796	C3	N	11/6/2016	11/7/2016	11/8/2016	1
34	100734795	C3	N	11/4/2016	11/7/2016	11/8/2016	1

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --			5296	As of -- 10/26/2017		
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	SUSAN PICATTI DESIGN	1/31/2016	\$ 300.00	LOGO AND PAPERWORK DESIGN.	This should have been reported as debt on the C4 covering the time period of December 2015.	654
2	OVERNIGHT PRINTING & GRAPHICS, INC.	2/18/2016	\$ 445.85	REMIT ENVELOPES	This should have been reported as debt on the C4 covering the time period of January 2016.	624
3	SEAQUIST LARRY	2/26/2016	\$ 400.00	1/2016 & 2/2016 OFFICE RENT	This should have been reported as debt on the C4 covering the time period of January 2016.	624
4	SEAQUIST LARRY	2/26/2016	\$ 301.40	BORUCK PRINTING & SILKSCREEN	This should have been reported as debt on the C4 covering the time period of January 2016.	624
5	SEAQUIST LARRY	2/26/2016	\$ 400.00	LOAN REPAYMENT	This should have been reported as debt on the C4 covering the time period of January 2016.	624
6	OVERNIGHT PRINTING & GRAPHICS, INC.	3/9/2016	\$ 649.49	#10 ENVELOPES	This should have been reported as debt on the C4 covering the time period of February 2016.	595
7	FDR SERVICES	5/9/2016	\$ 3,000.00	WEB SITE AND FACEBOOK DEVELOPMENT & MAINTENANCE.	This should have been reported as debt on the C4 covering the time period of April 2016.	533
8	OVERNIGHT PRINTING & GRAPHICS, INC.	5/31/2016	\$ 1,609.40	STATIONERY	This should have been reported as debt on the C4 covering the time period of April 2016.	533
9	SEAQUIST LARRY	5/31/2016	\$ 477.54	REIMBURSEMENT TO CANDIDATE	This should have been reported as debt on the C4 covering the time period of April 2016.	533
10	ALISSA MULLER	6/27/2016	\$ 1,126.65	PAYROLL AFTER DEDUCTIONS	This should have been reported as debt on the C4 covering the time period of May 2016.	503
11	ALISSA MULLER	7/8/2016	\$ 1,155.70	PAY	This should have been reported as debt on the C4 covering the time period of May 2016.	503
12	SUSAN PICATTI DESIGN	6/23/2016	\$ 1,025.00	DESIGN LTRHD, AGENDA, ETC.	This should have been reported as debt on the C4 covering the time period of May 2016.	503
13	ALISSA MULLER	7/21/2016	\$ 1,155.69	PAYROLL	This should have been reported as debt on the 21 day pre-primary C4.	471
14	PROGRESSIVE STRATEGIES NW	7/14/2016	\$ 5,222.59	POSTAGE	This should have been reported as debt on the 21 day pre-primary C4.	471
15	PROGRESSIVE STRATEGIES NW	7/14/2016	\$ 6,581.61	PRINTING & PROCESSING.	This should have been reported as debt on the 21 day pre-primary C4.	471
16	PROGRESSIVE STRATEGIES NW	7/14/2016	\$ 559.44	SALES TAX	This should have been reported as debt on the 21 day pre-primary C4.	471
17	TOM HUJAR	7/12/2016	\$ 13,000.00	TOM HUJAR,PAID CONTRACT FOR SERVICES.	This should have been reported as debt on the 21 day pre-primary C4.	471
18	ALISSA MULLER	8/5/2016	\$ 1,155.70	PAY LESS WITHHOLDING	This should have been reported as debt on the 7-day pre-primary C4.	457
19	ALISSA MULLER	8/19/2016	\$ 1,150.73	PAYROLL	This should have been reported as debt on the 7-day pre-primary C4.	457
20	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 825.69	JOHNSON COX PRINTING	This should have been reported as debt on the 7-day pre-primary C4.	457
21	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 3,912.47	PRODUCTION, MAILHOUSE & TARGETING	This should have been reported as debt on the 7-day pre-primary C4.	457
22	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 2,726.51	USPS FOR MAILER	This should have been reported as debt on the 7-day pre-primary C4.	457
23	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 402.74	SALES TAX	This should have been reported as debt on the 7-day pre-primary C4.	457
24	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 601.09	FACEBOOK ADS	This should have been reported as debt on the 7-day pre-primary C4.	457
25	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 2,500.00	RETAINER FOR PRIMARY	This should have been reported as debt on the 7-day pre-primary C4.	457
26	PROGRESSIVE STRATEGIES NW	7/26/2016	\$ 1,495.00	TELEPHONE TOWN HALL	This should have been reported as debt on the 7-day pre-primary C4.	457
27	PROGRESSIVE STRATEGIES NW	7/26/2016	\$ 2,189.28	NEWSPAPER & FACEBOOK ADS	This should have been reported as debt on the 7-day pre-primary C4.	457
28	PROGRESSIVE STRATEGIES NW	7/26/2016	\$ 300.87	ROBOCALL	This should have been reported as debt on the 7-day pre-primary C4.	457
29	SEAQUIST CARLA	8/3/2016	\$ 5,000.00	LOAN REPAYMENT	This should have been reported as debt on the 7-day pre-primary C4.	457
30	SEAQUIST LARRY	8/25/2016	\$ 575.00	PROFESSIONAL SERVICES	This should have been reported as debt on the 7-day pre-primary C4.	457
31	SEAQUIST LARRY	8/25/2016	\$ 295.16	WOOD STAKES	This should have been reported as debt on the 7-day pre-primary C4.	457
32	SEAQUIST LARRY	8/25/2016	\$ 5,000.00	LOAN REPAYMENT	This should have been reported as debt on the 7-day pre-primary C4.	457
33	ALISSA MULLER	9/2/2016	\$ 1,150.72	PAY	This should have been reported as debt on the post-primary C4.	409
34	ALISSA MULLER	9/16/2016	\$ 1,150.73	CAMPAIGN MANAGER	This should have been reported as debt on the post-primary C4.	409
35	ALISSA MULLER	9/30/2016	\$ 1,150.73	CAMPAIGN MANAGER	This should have been reported as debt on the post-primary C4.	409
36	ALISSA MULLER	10/14/2016	\$ 1,150.72	CAMPAIGN MANAGER	This should have been reported as debt on the post-primary C4.	409
37	CENTURY LINK	9/27/2016	\$ 1,658.50	PHONE & INTERNET	This should have been reported as debt on the post-primary C4.	409
38	CENTURY LINK	10/14/2016	\$ 364.70	PHONE, INTERNET EXPENSE	This should have been reported as debt on the post-primary C4.	409
39	PROGRESSIVE STRATEGIES NW	9/16/2016	\$ 3,248.50	YARD SIGNS 1130 PURCHASED @XPRESS SIGNS	This should have been reported as debt on the post-primary C4.	409
40	PROGRESSIVE STRATEGIES NW	9/16/2016	\$ 276.12	SALES TAX	This should have been reported as debt on the post-primary C4.	409
41	PROGRESSIVE STRATEGIES NW	10/6/2016	\$ 40,000.00	MEDIA	This should have been reported as debt on the post-primary C4.	409
42	PROGRESSIVE STRATEGIES NW	10/7/2016	\$ 1,889.55	NEWSPAPER ADS - SEE ATTACHED	This should have been reported as debt on the post-primary C4.	409
43	PROGRESSIVE STRATEGIES NW	10/12/2016	\$ 2,500.00	2ND HALF RETAINER	This should have been reported as debt on the post-primary C4.	409
44	PROGRESSIVE STRATEGIES NW	10/13/2016	\$ 5,000.00	ONLINE PREROLL ADS	This should have been reported as debt on the post-primary C4.	409
45	PROGRESSIVE STRATEGIES NW	10/13/2016	\$ 800.00	FACEBOOK ADS	This should have been reported as debt on the post-primary C4.	409
46	PROGRESSIVE STRATEGIES NW	10/13/2016	\$ 3,000.00	ONLINE BANNER ADS	This should have been reported as debt on the post-primary C4.	409
47	SIMON ROXANNE	9/30/2016	\$ 417.75	FIELD COORDINATOR	This should have been reported as debt on the post-primary C4.	409
48	SIMON ROXANNE	10/14/2016	\$ 417.75	FIELD AGENT	This should have been reported as debt on the post-primary C4.	409
49	SUSAN PICATTI DESIGN	9/16/2016	\$ 1,303.00	DESIGN & PRODUCE OFFICE SUPPLIES & WEB SITE.	This should have been reported as debt on the post-primary C4.	409
50	ALISSA MULLER	10/28/2016	\$ 1,150.74	CAMPAIGN MANAGER	This should have been reported as debt on the 21 day pre-general C4.	373
51	INTERNAL REVENUE SERVICE	10/20/2016	\$ 2,448.76	WITHHOLDING PLUS SS	This should have been reported as debt on the 21 day pre-general C4.	373
52	PROGRESSIVE STRATEGIES NW	10/20/2016	\$ 20,000.00	TV - COMCAST SPOTLIGHT - SEE ATTACHED	This should have been reported as debt on the 21 day pre-general C4.	373
53	PROGRESSIVE STRATEGIES NW	10/31/2016	\$ 1,067.86	TELE-TOWN HALL	This should have been reported as debt on the 21 day pre-general C4.	373
54	PROGRESSIVE STRATEGIES NW	10/31/2016	\$ 12,852.50	CABLE BUY- COMCAST SPOTLIGHT - PARTIAL PAYMENT	This should have been reported as debt on the 21 day pre-general C4.	373
55	SIMON ROXANNE	10/28/2016	\$ 417.76	FIELD COORDINATOR	This should have been reported as debt on the 21 day pre-general C4.	373
56	ALISSA MULLER	11/17/2016	\$ 1,380.86	CAMPAIGN MANAGER	This should have been reported as debt on the 7 day pre-general C4.	359
57	ALISSA MULLER	11/23/2016	\$ 370.73	CAMPAIGN MANAGER	This should have been reported as debt on the 7 day pre-general C4.	359
58	PROGRESSIVE STRATEGIES NW	11/9/2016	\$ 10,000.00	VIDEO SUPPORT, VOICE CTING, VIDEO PRODUCTION & CABLE BUY.	This should have been reported as debt on the 7 day pre-general C4.	359
59	PROGRESSIVE STRATEGIES NW	11/3/2016	\$ 741.56	ROBOCALL - PREMIERE POLITICAL	This should have been reported as debt on the 7 day pre-general C4.	359
60	PROGRESSIVE STRATEGIES NW	11/3/2016	\$ 6,176.19	PRODUCTION, TARGETING, MAILHOUSE, POSTAGE	This should have been reported as debt on the 7 day pre-general C4.	359
61	PROGRESSIVE STRATEGIES NW	11/3/2016	\$ 1,664.26	FACEBOOK ADS, ONLINE ADS, GRAPHICS	This should have been reported as debt on the 7 day pre-general C4.	359
62	PROGRESSIVE STRATEGIES NW	11/7/2016	\$ 2,000.00	ON-LINE BANNER AD, EL TORO	This should have been reported as debt on the 7 day pre-general C4.	359

63	PROGRESSIVE STRATEGIES NW	11/7/2016	\$	2,600.00	ON-LINE BANNER AD PREROLL, EL TORO	This should have been reported as debt on the 7 day pre-general C4.	359
64	SIMON ROXANNE	11/17/2016	\$	543.08	FIELD REPRESENTATIVE	This should have been reported as debt on the 7 day pre-general C4.	359
65	INTERNAL REVENUE SERVICE	12/12/2016	\$	1,455.12	PAYROLL WITHHOLDING TAXES & SOCIAL SECURITY, FORM 941	This should have been reported as debt on the C4 covering the time period of November 2016.	318
66	SEAQUIST CARLA	12/30/2016	\$	3,000.00	LOAN REPAYMENT	This should have been reported as debt on the C4 covering the time period of November 2016.	318
67	SEAQUIST LARRY	12/30/2016	\$	5,402.39	LOAN REPAYMENT	This should have been reported as debt on the C4 covering the time period of November 2016.	318
Total				\$ 204,291.18			

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		4048		As of --		10/26/2017			
Violation #	Vendor	Date	Amount	Description	Violation	Violation	Report #	Approx. days late as of today	
1	OVERNIGHT PRINTING & GRAPHICS, INC.	2/18/2016	\$ 445.85	REMIT ENVELOPES		Failure to identify number of items printed.	100679928	595	
2	SEAQUIST LARRY	2/26/2016	\$ 400.00	1/2016 & 2/2016 OFFICE RENT		Failure to identify subvendor.	100679928	595	
3	SEAQUIST LARRY	2/26/2016	\$ 301.40	BORUCK PRINTING & SILKSCREEN		Failure to identify number of items printed.	100679928	595	
4	SEAQUIST LARRY	2/26/2016	\$ 59.93	JANUARY PHONE EXPENSE		Failure to identify subvendor.	100679928	595	
5	OVERNIGHT PRINTING & GRAPHICS, INC.	3/9/2016	\$ 649.49	#10 ENVELOPES		Failure to identify number of items printed.	100689227	563	
6	OVERNIGHT PRINTING & GRAPHICS, INC.	5/31/2016	\$ 1,609.40	STATIONERY		Failure to identify number of items printed.	100700981	503	
7	SEAQUIST LARRY	5/31/2016	\$ 477.54	REIMBURSEMENT TO CANDIDATE		Failure to identify subvendor.	100700981	503	
8	SEAQUIST LARRY	6/27/2016	\$ 100.00	REIMBURSE CASH EXPENSE, 2 BREMERTON VIDEO VOTERS GUIDE.		Failure to identify subvendor.	100742097	471	
9	PROGRESSIVE STRATEGIES NW	7/14/2016	\$ 6,581.61	PRINTING & PROCESSING.		Failure to identify number of items printed.	100742098	457	
10	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 825.69	JOHNSON COX PRINTING PRODUCTION, MAILHOUSE &		Failure to identify number of items printed.	100742099	409	
11	PROGRESSIVE STRATEGIES NW	8/8/2016	\$ 3,912.47	TARGETING		Failure to identify number of items printed.	100742099	409	
12	PROGRESSIVE STRATEGIES NW	7/26/2016	\$ 1,495.00	TELEPHONE TOWN HALL		Failure to identify subvendor.	100742099	409	
13	PROGRESSIVE STRATEGIES NW	7/26/2016	\$ 2,189.28	NEWSPAPER & FACEBOOK ADS		Failure to identify subvendor.	100742099	409	
14	PROGRESSIVE STRATEGIES NW	7/26/2016	\$ 250.00	PHOTO SHOOT		Failure to identify subvendor.	100742099	409	
15	PROGRESSIVE STRATEGIES NW	7/26/2016	\$ 300.87	ROBOCALL		Failure to identify subvendor.	100742099	409	
16	SEAQUIST LARRY	7/28/2016	\$ 63.05	COPIER PRINT CARTRIDGE		Failure to identify subvendor.	100742099	409	
17	SEAQUIST LARRY	8/25/2016	\$ 575.00	PROFESSIONAL SERVICES		Failure to identify subvendor.	100742099	409	
18	SEAQUIST LARRY	8/25/2016	\$ 295.16	WOOD STAKES		Failure to identify subvendor.	100742099	409	
19	CASH	9/16/2016	\$ 71.49	PRINTER CARTRIDGE		Failure to identify subvendor.	100742100	373	
20	MILLER JANET	9/27/2016	\$ 183.91	FOOD FOR EVENT		Failure to identify subvendor.	100742100	373	
21	PROGRESSIVE STRATEGIES NW	10/6/2016	\$ 40,000.00	MEDIA		Failure to identify subvendor.	100742100	373	
22	PROGRESSIVE STRATEGIES NW	10/7/2016	\$ 1,889.55	NEWSPAPER ADS - SEE ATTACHED		Failure to identify subvendor.	100742100	373	
23	PROGRESSIVE STRATEGIES NW	10/13/2016	\$ 5,000.00	ONLINE PREROLL ADS		Failure to identify subvendor.	100742100	373	
24	PROGRESSIVE STRATEGIES NW	10/13/2016	\$ 3,000.00	ONLINE BANNER ADS DESIGN & PRODUCE OFFICE SUPPLIES		Failure to identify subvendor.	100742100	373	
25	SUSAN PICATTI DESIGN	9/16/2016	\$ 1,303.00	& WEB SITE.		Failure to identify number of items printed.	100742100	373	
26	PROGRESSIVE STRATEGIES NW	10/31/2016	\$ 200.00	AUTODIALEER		Failure to identify subvendor.	100742101	359	
27	PROGRESSIVE STRATEGIES NW	10/31/2016	\$ 1,067.86	TELE-TOWN HALL VIDEO SUPPORT, VOICE CTING, VIDEO		Failure to identify subvendor.	100742101	359	
28	PROGRESSIVE STRATEGIES NW	11/9/2016	\$ 10,000.00	PRODUCTION & CABLE BUY. PRODUCTION, TARGETING,		Failure to identify subvendor.	100742102	318	
29	PROGRESSIVE STRATEGIES NW	11/3/2016	\$ 6,176.19	MAILHOUSE, POSTAGE FACEBOOK ADS, ONLINE ADS,		Failure to identify subvendor.	100742102	318	
30	PROGRESSIVE STRATEGIES NW	11/3/2016	\$ 1,664.26	GRAPHICS		Failure to identify subvendor.	100742102	318	
31	PROGRESSIVE STRATEGIES NW	11/7/2016	\$ 149.50	AUTODIALER REIMBURSEMENT		Failure to identify subvendor.	100742102	318	
Total			\$ 91,237.50						