

File a Formal Complaint - Glen Morgan

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

It has come to my attention that the 27th District Democrats 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 27th District Democrats 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 27th District Democrats 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 27th District Democrats 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 27th District Democrats 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 --			2159			As of -- 10/13/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. da Filer ID	
1	EDMONDS CAROLYN	6/27/2016	\$ 84.80	EXPENSES FOR MEEKER CAUCUS	Failure to identify subvendor.	100706470	458	27TH DIST DEMO ORG EXEMPT FUND
2	COLE SHAWN	6/27/2016	\$ 136.90	EXPENSES FOR FOSS CAUCUSES	Failure to identify subvendor.	100706470	458	27TH DIST DEMO ORG EXEMPT FUND
3	ANDO DEAN	2/10/2016	\$ 144.69	WSDCC EXPENSES	Failure to identify subvendor.	100683684	582	27TH DIST DEMO ORG EXEMPT FUND
4	VISI PRINTING AND SIGNS	3/24/2016	\$ 454.02	CAUCUS SIGNS	Failure to identify number of items printed.	100688213	550	27TH DIST DEMO ORG EXEMPT FUND
5	FOSTER LYNDA	7/18/2016	\$ 125.00	EXPENSES FOR DNC IN PHILADELPHIA	Failure to identify subvendor.	100710282	444	27TH DIST DEMO ORG VICTORY FUND
6	LATCH ANITA	7/18/2016	\$ 275.00	EXPENSES FOR DNC IN PHILADELPHIA	Failure to identify subvendor.	100710282	444	27TH DIST DEMO ORG VICTORY FUND
7	PATTIN ZACK	7/18/2016	\$ 325.00	EXPENSES FOR DNC IN PHILADELPHIA	Failure to identify subvendor.	100710282	444	27TH DIST DEMO ORG VICTORY FUND
8	FOSTER LYNDA	5/6/2017	\$ 58.62	OFFICE SUPPLIES	Failure to identify subvendor.	100775550	125	27TH DIST DEMO ORG EXEMPT FUND
Total			\$ 1,604.03					

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late -- 2602		As of -- 10/13/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
1	VISI PRINTING AND SIGNS	3/24/2016	\$ 454.02	CAUCUS SIGNS	This should have been reported as debt on the C4 covering the time period of February 2016.
2	THE SWISS	5/2/2016	\$ 638.00	FOOD AND BEVERAGES FOR GREAT EGGSPICATIONS	This should have been reported as debt on the C4 covering the time period of April 2016.
3	TACOMA PUBLIC SCHOOLS	6/16/2016	\$ 1,776.00	RENT FOR SCHOOLS FOR CAUCUSES	This should have been reported as debt on the C4 covering the time period of May 2016.
4	LATCH ANITA	7/18/2016	\$ 275.00	EXPENSES FOR DNC IN PHILADELPHIA	This should have been reported as debt on the 21 day pre-primary C4.
5	PATTIN ZACK	7/18/2016	\$ 325.00	EXPENSES FOR DNC IN PHILADELPHIA	This should have been reported as debt on the 21 day pre-primary C4.
6	FIRST UNITED METHODIST CHURCH	9/17/2016	\$ 300.00	RENT FOR FACILITY	This should have been reported as debt on the post-primary C4.
7	FOSTER LYNDA	5/6/2017	\$ 746.82	PAYMENT TO LYNDA FOSTER TO REIMBURSEMENT FOR THE SWISS	This should have been reported as debt on the C4 covering the time period of April 2017.
Total			\$ 4,514.84		
				Approx. days late	Filer ID
				582	27TH DIST DEMO ORG EXEMPT FUND
				520	27TH DIST DEMO ORG VICTORY FUND
				490	27TH DIST DEMO ORG EXEMPT FUND
				458	27TH DIST DEMO ORG VICTORY FUND
				458	27TH DIST DEMO ORG VICTORY FUND
				396	27TH DIST DEMO ORG EXEMPT FUND
				156	27TH DIST DEMO ORG EXEMPT FUND

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 8385

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late	Filer Name
1	100775555 C3	N		1/24/2016	2/10/2016	7/17/2017	523	27TH DIST DEMO ORG VICTORY FUND
2	100747068 C3	N		1/24/2016	2/10/2016	2/6/2017	362	27TH DIST DEMO ORG EXEMPT FUND
3	100775576 C4	N			2/10/2017	7/17/2017	157	27TH DIST DEMO ORG VICTORY FUND
4	100775546 C4	N			2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
5	100775493 C3	N		1/23/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
6	100775498 C3	N		1/25/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
7	100775500 C3	N		1/27/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
8	100775556 C3	N		1/20/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG VICTORY FUND
9	100775492 C3	N		1/23/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
10	100775491 C3	N		1/6/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
11	100775554 C3	N		1/11/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG VICTORY FUND
12	100775497 C3	N		1/20/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
13	100775490 C3	N		1/5/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
14	100775494 C3	N		1/24/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
15	100775553 C3	N		1/11/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG VICTORY FUND
16	100775489 C3	N		1/11/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
17	100775545 C3	N		1/24/2017	2/10/2017	7/17/2017	157	27TH DIST DEMO ORG EXEMPT FUND
18	100775577 C4	N			3/10/2017	7/17/2017	129	27TH DIST DEMO ORG VICTORY FUND
19	100775547 C4	N			3/10/2017	7/17/2017	129	27TH DIST DEMO ORG EXEMPT FUND
20	100775502 C3	N		2/6/2017	3/10/2017	7/17/2017	129	27TH DIST DEMO ORG EXEMPT FUND
21	100775501 C3	N		2/1/2017	3/10/2017	7/17/2017	129	27TH DIST DEMO ORG EXEMPT FUND
22	100775506 C3	N		2/27/2017	3/10/2017	7/17/2017	129	27TH DIST DEMO ORG EXEMPT FUND
23	100775508 C3	N		2/17/2017	3/10/2017	7/17/2017	129	27TH DIST DEMO ORG EXEMPT FUND
24	100775557 C3	N		2/17/2017	3/10/2017	7/17/2017	129	27TH DIST DEMO ORG VICTORY FUND
25	100775504 C3	N		2/27/2017	3/10/2017	7/17/2017	129	27TH DIST DEMO ORG EXEMPT FUND
26	100733844 C3	N		7/18/2016	7/25/2016	11/4/2016	102	27TH DIST DEMO ORG VICTORY FUND
27	100775548 C4	N			4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
28	100775578 C4	N			4/10/2017	7/17/2017	98	27TH DIST DEMO ORG VICTORY FUND
29	100775503 C3	N		3/1/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
30	100775512 C3	N		3/17/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
31	100775559 C3	N		3/17/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG VICTORY FUND
32	100775507 C3	N		3/2/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
33	100775514 C3	N		3/29/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
34	100775511 C3	N		3/14/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
35	100775513 C3	N		3/21/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
36	100775510 C3	N		3/14/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
37	100775516 C3	N		3/31/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
38	100775509 C3	N		3/10/2017	4/10/2017	7/17/2017	98	27TH DIST DEMO ORG EXEMPT FUND
39	100741227 C4	N			10/18/2016	1/10/2017	84	27TH DIST DEMO ORG EXEMPT FUND
40	100733846 C3	Y		8/19/2016	8/22/2016	11/4/2016	74	27TH DIST DEMO ORG VICTORY FUND
41	100757224 C4	Y			2/10/2017	4/24/2017	73	27TH DIST DEMO ORG VICTORY FUND
42	100757234 C3	Y		1/23/2017	2/10/2017	4/24/2017	73	27TH DIST DEMO ORG VICTORY FUND
43	100741228 C4	Y			11/1/2016	1/10/2017	70	27TH DIST DEMO ORG EXEMPT FUND
44	100709029 C4	Y			5/10/2016	7/18/2016	69	27TH DIST DEMO ORG EXEMPT FUND
45	100775549 C4	N			5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
46	100775579 C4	N			5/10/2017	7/17/2017	68	27TH DIST DEMO ORG VICTORY FUND
47	100775518 C3	N		4/11/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
48	100775560 C3	N		4/21/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG VICTORY FUND
49	100775564 C3	N		4/29/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG VICTORY FUND
50	100775558 C3	N		4/18/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG VICTORY FUND
51	100775521 C3	N		4/21/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
52	100775562 C3	N		4/25/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG VICTORY FUND
53	100775523 C3	N		4/24/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
54	100775517 C3	N		4/4/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
55	100775525 C3	N		4/28/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
56	100775522 C3	N		4/21/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
57	100775519 C3	N		4/19/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
58	100775520 C3	N		4/24/2017	5/10/2017	7/17/2017	68	27TH DIST DEMO ORG EXEMPT FUND
59	100733850 C3	N		8/22/2016	8/29/2016	11/4/2016	67	27TH DIST DEMO ORG VICTORY FUND
60	100733852 C4	Y			9/12/2016	11/4/2016	53	27TH DIST DEMO ORG VICTORY FUND
61	100733843 C3	Y		9/16/2016	9/19/2016	11/4/2016	46	27TH DIST DEMO ORG VICTORY FUND
62	100757225 C4	Y			3/10/2017	4/24/2017	45	27TH DIST DEMO ORG VICTORY FUND
63	100775580 C4	N			6/10/2017	7/17/2017	37	27TH DIST DEMO ORG VICTORY FUND
64	100775550 C4	N			6/10/2017	7/17/2017	37	27TH DIST DEMO ORG EXEMPT FUND
65	100775527 C3	N		5/1/2017	6/10/2017	7/17/2017	37	27TH DIST DEMO ORG EXEMPT FUND
66	100775570 C3	N		5/12/2017	6/10/2017	7/17/2017	37	27TH DIST DEMO ORG VICTORY FUND
67	100775568 C3	N		5/10/2017	6/10/2017	7/17/2017	37	27TH DIST DEMO ORG VICTORY FUND
68	100775533 C3	N		5/8/2017	6/10/2017	7/17/2017	37	27TH DIST DEMO ORG EXEMPT FUND

69	100775536 C3	N	5/19/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
70	100775528 C3	N	5/2/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
71	100775563 C3	N	5/3/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG VICTORY FUND
72	100775544 C3	N	5/2/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
73	100775565 C3	N	5/1/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG VICTORY FUND
74	100775566 C3	N	5/6/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG VICTORY FUND
75	100775573 C3	N	5/19/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG VICTORY FUND
76	100775532 C3	N	5/7/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
77	100775530 C3	N	5/4/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
78	100775535 C3	N	5/25/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
79	100775526 C3	N	5/3/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
80	100775529 C3	N	5/3/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG EXEMPT FUND
81	100775569 C3	N	5/12/2017	6/10/2017	7/17/2017	37 27TH DIST DEMO ORG VICTORY FUND
82	100775537 C3	N	6/5/2017	6/12/2017	7/17/2017	35 27TH DIST DEMO ORG EXEMPT FUND
83	100729295 C3	N	9/14/2016	9/19/2016	10/21/2016	32 27TH DIST DEMO ORG VICTORY FUND
84	100741229 C4	Y		12/12/2016	1/10/2017	29 27TH DIST DEMO ORG EXEMPT FUND
85	100775571 C3	N	6/12/2017	6/19/2017	7/17/2017	28 27TH DIST DEMO ORG VICTORY FUND
86	100775575 C3	N	6/16/2017	6/19/2017	7/17/2017	28 27TH DIST DEMO ORG VICTORY FUND
87	100775538 C3	N	6/12/2017	6/19/2017	7/17/2017	28 27TH DIST DEMO ORG EXEMPT FUND
88	100775541 C3	N	6/16/2017	6/19/2017	7/17/2017	28 27TH DIST DEMO ORG EXEMPT FUND
89	100775539 C3	N	6/19/2017	6/26/2017	7/17/2017	21 27TH DIST DEMO ORG EXEMPT FUND
90	100775540 C3	N	6/20/2017	6/26/2017	7/17/2017	21 27TH DIST DEMO ORG EXEMPT FUND
91	100750412 C4	N		2/10/2017	3/1/2017	19 27TH DIST DEMO ORG EXEMPT FUND
92	100733853 C4	N		10/18/2016	11/4/2016	17 27TH DIST DEMO ORG VICTORY FUND
93	100676188 C4	N		1/11/2016	1/26/2016	15 27TH DIST DEMO ORG VICTORY FUND
94	100676187 C4	N		1/11/2016	1/26/2016	15 27TH DIST DEMO ORG EXEMPT FUND
95	100676199 C4	Y		1/11/2016	1/26/2016	15 27TH DIST DEMO ORG EXEMPT FUND
96	100676198 C3	N	12/18/2015	1/11/2016	1/26/2016	15 27TH DIST DEMO ORG EXEMPT FUND
97	100757226 C4	Y		4/10/2017	4/24/2017	14 27TH DIST DEMO ORG VICTORY FUND
98	100719587 C3	N	8/23/2016	8/29/2016	9/9/2016	11 27TH DIST DEMO ORG VICTORY FUND
99	100733848 C3	N	10/21/2016	10/24/2016	11/4/2016	11 27TH DIST DEMO ORG VICTORY FUND
100	100756959 C4	Y		4/10/2017	4/20/2017	10 27TH DIST DEMO ORG EXEMPT FUND
101	100756957 C4	N		4/10/2017	4/20/2017	10 27TH DIST DEMO ORG EXEMPT FUND
102	100756958 C3	N	3/17/2017	4/10/2017	4/20/2017	10 27TH DIST DEMO ORG EXEMPT FUND
103	100723125 C3	N	9/16/2016	9/19/2016	9/28/2016	9 27TH DIST DEMO ORG EXEMPT FUND
104	100723128 C3	N	9/16/2016	9/19/2016	9/28/2016	9 27TH DIST DEMO ORG VICTORY FUND
105	100710272 C3	N	7/17/2016	7/18/2016	7/25/2016	7 27TH DIST DEMO ORG VICTORY FUND
106	100780076 C3	N	7/21/2017	7/24/2017	7/31/2017	7 27TH DIST DEMO ORG EXEMPT FUND
107	100780073 C3	N	7/21/2017	7/24/2017	7/31/2017	7 27TH DIST DEMO ORG VICTORY FUND
108	100783913 C3	N	8/18/2017	8/21/2017	8/28/2017	7 27TH DIST DEMO ORG VICTORY FUND
109	100783912 C3	N	8/18/2017	8/21/2017	8/28/2017	7 27TH DIST DEMO ORG EXEMPT FUND
110	100775551 C4	N		7/11/2017	7/17/2017	6 27TH DIST DEMO ORG EXEMPT FUND
111	100775581 C4	N		7/11/2017	7/17/2017	6 27TH DIST DEMO ORG VICTORY FUND
112	100780068 C4	N		7/25/2017	7/31/2017	6 27TH DIST DEMO ORG EXEMPT FUND
113	100780074 C4	N		7/25/2017	7/31/2017	6 27TH DIST DEMO ORG VICTORY FUND
114	100729289 C3	N	10/14/2016	10/17/2016	10/21/2016	4 27TH DIST DEMO ORG EXEMPT FUND
115	100733826 C4	N		11/1/2016	11/4/2016	3 27TH DIST DEMO ORG EXEMPT FUND
116	100733841 C4	N		11/1/2016	11/4/2016	3 27TH DIST DEMO ORG VICTORY FUND
117	100756313 C4	N		4/10/2017	4/12/2017	2 27TH DIST DEMO ORG VICTORY FUND
118	100703542 C3	N	6/17/2016	6/20/2016	6/22/2016	2 27TH DIST DEMO ORG EXEMPT FUND
119	100703543 C3	N	6/17/2016	6/20/2016	6/22/2016	2 27TH DIST DEMO ORG VICTORY FUND
120	100737908 C3	N	11/18/2016	12/10/2016	12/12/2016	2 27TH DIST DEMO ORG VICTORY FUND
121	100737903 C3	N	11/18/2016	12/10/2016	12/12/2016	2 27TH DIST DEMO ORG EXEMPT FUND
122	100756311 C3	N	3/31/2017	4/10/2017	4/12/2017	2 27TH DIST DEMO ORG VICTORY FUND
123	100756306 C3	N	3/14/2017	4/10/2017	4/12/2017	2 27TH DIST DEMO ORG VICTORY FUND
124	100756307 C3	N	3/14/2017	4/10/2017	4/12/2017	2 27TH DIST DEMO ORG VICTORY FUND
125	100756308 C3	N	3/17/2017	4/10/2017	4/12/2017	2 27TH DIST DEMO ORG VICTORY FUND
126	100756310 C3	N	3/29/2017	4/10/2017	4/12/2017	2 27TH DIST DEMO ORG VICTORY FUND
127	100756309 C3	N	3/21/2017	4/10/2017	4/12/2017	2 27TH DIST DEMO ORG VICTORY FUND
128	100671816 C4	N		12/10/2015	12/11/2015	1 27TH DIST DEMO ORG VICTORY FUND
129	100671818 C4	N		12/10/2015	12/11/2015	1 27TH DIST DEMO ORG EXEMPT FUND
130	100671817 C3	N	11/20/2015	12/10/2015	12/11/2015	1 27TH DIST DEMO ORG EXEMPT FUND
131	100671814 C3	N	11/20/2015	12/10/2015	12/11/2015	1 27TH DIST DEMO ORG VICTORY FUND
132	100701376 C3	N	5/26/2016	6/10/2016	6/11/2016	1 27TH DIST DEMO ORG EXEMPT FUND