

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

[Glenmorgan89](#) reported (Fri, 13 Oct at 12:17 AM) via Portal **Meta**  
To Whom it May Concern --

It has come to my attention that the 44<sup>th</sup> 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 44<sup>th</sup> 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 44<sup>th</sup> 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 44<sup>th</sup> 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 44th 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 --		886		As of --		10/12/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	BORUCK PRINTING	3/17/2016	\$ 258.66	INVOICE #4345 - REMIT ENVELOPES	Failure to identify number of items printed.	100689210	549
2	MCGINNESS DIANA	1/21/2017	\$ 27.11	PRINTER PAPER	Failure to identify subvendor.	100752913	244
3	THE FRANK DOOLITTLE COMPANY	6/23/2017	\$ 412.79	T SHIRT ORDER	Failure to identify number of items printed.	100771926	93
4	THE FRANK DOOLITTLE COMPANY	7/5/2017	\$ 245.66	T-SHIRT ORDER PAYMENT	Failure to identify number of items printed.	100780584	93
Total			\$ 944.22				

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

Approximate Cumulative Days Late --		3516		As of -- 10/12/2017		
Violation #Vendor	Date	Amount	Description	Debt that was illegally not reported.		Approx. days late
1 LAKE STEVENS SCHOOL DISTRICT	4/30/2016	\$ 408.00	CUSTODIAN FEES - PRECINCT CAUCUSES	This should have been reported as debt on the C4 covering the time period of March 2016.		549
2 MILL CREEK BUSINESS ASSOCIATION	6/4/2016	\$ 300.00	MILL CREEK FESTIVAL 2016	This should have been reported as debt on the C4 covering the time period of May 2016.		489
3 SNOHOMISH SCHOOL DISTRICT	7/13/2016	\$ 390.50	RENT FACILITY FOR PRECINCT CAUCUSES	This should have been reported as debt on the 21 day pre-primary C4.		457
4 SNOHOMISH SCHOOL DISTRICT	7/13/2016	\$ 789.50	RENT FACILITY FOR LD CAUCUS	This should have been reported as debt on the 21 day pre-primary C4.		457
5 WINGERT INSURANCE AGENCY	12/16/2016	\$ 663.65	INSURANCE PREMIUM	This should have been reported as debt on the C4 covering the time period of November 2016.		304
6 BORUCK PRINTING	3/17/2016	\$ 258.66	INVOICE #4345 - REMIT ENVELOPES	This should have been reported as debt on the C4 covering the time period of February 2016.		581
7 WINGERT INSURANCE AGENCY	12/22/2015	\$ 663.65	INSURANCE	This should have been reported as debt on the C4 covering the time period of November 2015.		672
8 LUNARPAGES HOSTING	4/10/2017	\$ 372.45	60 MONTHS WEBSITE HOSTING	This should have been reported as debt on the C4 covering the time period of March 2017.		185
9 SNOHOMISH COUNTY DEMOCRATS	6/10/2017	\$ 1,000.00	GALA TABLE SPONSORSHIP	This should have been reported as debt on the C4 covering the time period of May 2017.		124
10 THE FRANK DOOLITTLE COMPANY	6/23/2017	\$ 412.79	T SHIRT ORDER	This should have been reported as debt on the C4 covering the time period of May 2017.		124
11 MCBA FESTIVAL	5/21/2017	\$ 300.00	BOOTH FEE	This should have been reported as debt on the C4 covering the time period of April 2017.		155
Total		\$ 5,559.20				

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

Approximate Cumulative Days Late -- 696

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100776148	C3	Y	3/13/2017	4/10/2017	7/19/2017	100
2	100776149	C3	Y	5/16/2017	6/10/2017	7/19/2017	39
3	100752913	C4	Y		2/10/2017	3/19/2017	37
4	100752912	C3	Y	1/6/2017	2/10/2017	3/19/2017	37
5	100736903	C3	N	11/1/2016	11/7/2016	12/7/2016	30
6	100718991	C3	N	8/1/2016	8/8/2016	9/6/2016	29
7	100718992	C3	N	8/5/2016	8/8/2016	9/6/2016	29
8	100705039	C3	N	6/1/2016	6/6/2016	7/3/2016	27
9	100784606	C3	N	8/5/2017	8/7/2017	9/2/2017	26
10	100780584	C4	N		7/11/2017	8/3/2017	23
11	100708096	C3	N	6/17/2016	6/20/2016	7/12/2016	22
12	100718993	C3	N	8/12/2016	8/15/2016	9/6/2016	22
13	100707238	C3	N	6/17/2016	6/20/2016	7/11/2016	21
14	100722438	C3	N	9/1/2016	9/5/2016	9/25/2016	20
15	100722449	C3	N	9/2/2016	9/5/2016	9/25/2016	20
16	100784607	C3	N	8/12/2017	8/14/2017	9/2/2017	19
17	100735812	C3	N	11/4/2016	11/7/2016	11/25/2016	18
18	100719236	C3	N	8/19/2016	8/22/2016	9/7/2016	16
19	100708100	C3	N	6/24/2016	6/27/2016	7/12/2016	15
20	100728382	C3	N	10/1/2016	10/3/2016	10/18/2016	15
21	100707183	C3	N	6/22/2016	6/27/2016	7/11/2016	14
22	100722448	C3	N	9/7/2016	9/12/2016	9/25/2016	13
23	100771925	C3	N	6/16/2017	6/19/2017	7/1/2017	12
24	100784608	C3	N	8/18/2017	8/21/2017	9/2/2017	12
25	100780583	C3	N	7/21/2017	7/24/2017	8/3/2017	10
26	100711966	C3	N	7/14/2016	7/18/2016	7/27/2016	9
27	100711971	C3	N	7/15/2016	7/18/2016	7/27/2016	9
28	100733501	C3	N	10/21/2016	10/24/2016	11/2/2016	9
29	100708120	C3	N	7/1/2016	7/4/2016	7/12/2016	8
30	100728397	C3	N	10/7/2016	10/10/2016	10/18/2016	8
31	100722439	C3	N	9/12/2016	9/19/2016	9/25/2016	6
32	100788569	C3	N	9/15/2017	9/18/2017	9/23/2017	5
33	100749125	C4	Y		2/10/2017	2/13/2017	3
34	100766897	C3	N	6/3/2017	6/5/2017	6/8/2017	3
35	100711967	C3	N	7/22/2016	7/25/2016	7/27/2016	2
36	100711972	C3	N	7/22/2016	7/25/2016	7/27/2016	2
37	100776173	C3	N	7/13/2017	7/17/2017	7/19/2017	2
38	100711977	C4	N		7/26/2016	7/27/2016	1
39	100733502	C4	N		11/1/2016	11/2/2016	1
40	100728383	C3	N	10/11/2016	10/17/2016	10/18/2016	1
41	100728402	C3	N	10/14/2016	10/17/2016	10/18/2016	1