

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Thu, 12 Oct at 11:39 PM) via Portal **Meta**
To Whom it May Concern --

It has come to my attention that the 21st 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 21st District Democrats has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

Additionally, the 21st District Democrats have failed to file ANY reports for 2015 or 2017, despite the fact that they selected full reporting in 2015, 2016 and 2017.

This is a serious violation of state law that must be rectified immediately.

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 21st 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 21st District Democrats illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

4) State law prohibits committees from accepting more than \$300 worth of anonymous contributions annually, or 1% of the total amount raised, whichever is greater. RCW 42.17A.220 (4). State law also establishes that candidates must return contributions that exceed the contribution limits

contained in RCW 42.17A.405 within 10 days of receipt. RCW 42.17A.405, RCW 42.17A.110, WAC 390-16-312.

In 2016, the 21st District Democrats reported having received \$2,204.00 in anonymous contributions, while they reported having received less than \$30,000 in total contributions. \$2204.00 is illegally in excess of the applicable \$300 anonymous contribution limit.

\$1904.00 was collected illegally by the Committee when it should have been sent to the State Treasurer's Office.

5) State law requires that the committee treasurer preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred. (Violation of RCW 42.17A.235 (6)).

State law further requires that the committee treasurer maintain a list of all individuals contribution no more than twenty-five dollars in the aggregate from any one person during the election campaign. **RCW 42.17A.240(2)(c).**

On information and belief, 21st District Democrats have failed to maintain financial records for a period of five calendar years following the year during which the transaction occurred. Specifically, I believe that they have failed to maintain a list of individuals contributing no more than twenty-five dollars in the aggregate from any one person.

The PDC should investigate the possibility that the 21st 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 B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		1038		As of -- 10/12/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late	
1	MEEKER-PIN MICHELE	4/1/2016	\$ 464.50	SLIMJIM INSERTS	This should have been reported as debt on the C4 covering the time period of March 2016.	549	5/11/2016
2	OVERNIGHT PRINTING & GRAPHICS, INC	4/1/2016	\$ 422.73	2500 REMITTANCE ENVELOPES	This should have been reported as debt on the C4 covering the time period of March 2016.	549	5/11/2016
3	EDMONDS SCHOOL DISTRICT NO. 15	4/18/2016	\$ 408.00	4/17/16 LD CAUCUS GYM RENTAL	This should have been reported as debt on the C4 covering the time period of March 2016.	549	5/11/2016
4	EDMONDS SCHOOL DISTRICT NO. 15	6/11/2016	\$ 282.00	CAUCUS OVERTIME RENTAL	This should have been reported as debt on the C4 covering the time period of May 2016.	489	7/12/2016
Total			\$ 1,577.23				

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		519		As of --		10/12/2017		Report #	Approx. days late as of today
Violation #	Vendor	Date	Amount	Description	Violation				
1	MEEKER-PIN MICHELE	4/1/2016	\$ 189.06	SIGNUP SHEETS, 34X4	Failure to identify number of items printed, failure to identify subvendor.			100695042	519
2	MEEKER-PIN MICHELE	4/1/2016	\$ 464.50	SLIMJIM INSERTS	Failure to identify number of items printed, failure to identify subvendor.			100695042	519
3	MEEKER-PIN MICHELE	4/1/2016	\$ 113.73	PRECINCT SIGNS	Failure to identify number of items printed, failure to identify subvendor.			100695042	519
4	MEEKER-PIN MICHELE	4/1/2016	\$ 215.36	BANNERS	Failure to identify number of items printed, failure to identify subvendor.			100695042	519
Total			\$ 982.65						

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 275

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100691094	C4	N		2/10/2016	4/16/2016	66
2	100694550	C4	N		3/10/2016	5/10/2016	61
3	100694433	C3	N	2/19/2016	3/10/2016	5/10/2016	61
4	100675514	C4	N		12/10/2015	1/13/2016	34
5	100694707	C4	N		4/11/2016	5/10/2016	29
6	100715356	C4	N		7/26/2016	8/10/2016	15
7	100675515	C4	N		1/11/2016	1/13/2016	2
8	100690728	C4	N		4/11/2016	4/13/2016	2
9	100708501	C4	N		7/12/2016	7/14/2016	2
10	100695042	C4	N		5/10/2016	5/11/2016	1
11	100695037	C3	N	4/19/2016	5/10/2016	5/11/2016	1
12	100695038	C3	N	4/19/2016	5/10/2016	5/11/2016	1