

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Mon, 9 Oct at 1:01 AM) via Portal **Meta**
To Whom it May Concern --

It has come to my attention that Renata Rollins, during her campaign for the Olympia City Council has 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, Renata Rollins 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.

Renata Rollins 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.

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

The PDC should investigate the possibility that Renata Rollins 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/describe expenditures.

Approximate Cumulative Days Late --		166	As of --		10/9/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	OLYMPIA COPY & PRINTING	6/28/2017	\$ 269.28	FLYERS		100781776	Failure to identify number of items printed. 90
2	OLYMPIA COPY & PRINTING	7/5/2017	\$ 266.56	FLYERS		100781776	Failure to identify number of items printed. 90
3	CAPITOL CITY PRESS	6/20/2017	\$ 1,238.74	YARD SIGNS		100781776	Failure to identify number of items printed. 90
4	FEDEX OFFICE PRINT & SHIP CENTER	7/14/2017	\$ 14.50	STICKERS		100781777	Failure to identify number of items printed. 76

Total \$ 1,789.08

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late -- 287				As of -- 10/9/2017		
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	OLYMPIA COPY & PRINTING	6/28/2017	\$ 269.28	FLYERS	This should have been reported as debt on the C4 covering the time period of May 2017.	121
2	OLYMPIA COPY & PRINTING	7/5/2017	\$ 266.56	FLYERS	This should have been reported as debt on the C4 covering the time period of May 2017.	121
3	BARTLET COLIN	7/15/2017	\$ 400.00	PAYMENT FOR CAMPAIGN MANAGEMENT SERVICES	This should have been reported as debt on the 21 day pre-primary C4.	90
4	OLYMPIA COPY & PRINTING	7/20/2017	\$ 383.52	3000 FLYERS	This should have been reported as debt on the 21 day pre-primary C4.	90
5	CAPITOL CITY PRESS	6/8/2017	\$ 299.36	500 REMIT ENVELOPES	This should have been reported as debt on the C4 covering the time period of May 2017.	121
6	CAPITOL CITY PRESS	6/20/2017	\$ 1,238.74	YARD SIGNS	This should have been reported as debt on the C4 covering the time period of May 2017.	121
7	CAPITOL CITY PRESS	8/8/2017	\$ 1,347.64	250 YARD SIGNS AND 250 METAL STAKES	This should have been reported as debt on the 7-day pre-primary C4.	76
Total			\$ 4,205.10			

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	100781776	C4	Y		7/11/2017	8/10/2017	30
2	100780409	C4	Y		7/11/2017	8/2/2017	22
3	100781777	C4	Y		7/25/2017	8/10/2017	16
4	100778616	C3	Y	7/3/2017	7/10/2017	7/25/2017	15