

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Wed, 27 Sep at 10:07 AM) via Portal [Meta](#)
To Whom it May Concern –

It has come to my attention that the Valley Professional Firefighters PAC has been willfully and habitually violating multiple provisions of **RCW 42.17A**. The most egregious of these violations appear to be strategic in nature to conceal the nature and size of political contributions to specific political candidates during the 2017 election cycle, but this may only be the tip of the iceberg for the illegal activity conducted by this PAC

1) Providing over limit contributions, failure to refund over-limit contribution within 10 business days. (Violation of RCW 42.17A.405(2), see WAC 390-16-310, WAC 390-05-400)

During the current campaign for reelection, Auburn Mayor candidate Nancy Backus accepted the following over-limit and illegal contributions:

The Valley Professional Firefighters PAC donated the statutory maximum donation to the Backus campaign of \$2,000 (\$1000 for the primary, and \$1000 for the general election) as reported by the Backus campaign (PDC **Report #100773652**) on July 7, 2017. However, the Valley Professional Firefighters PAC also made an in-kind contribution of \$478.51 on August 2, 2017 (PDC **Report #100784635**).

There is no record of any refund by Mayor Backus of the overlimit contributions made by the Valley Professional Firefighters PAC either of cash or the illegal overlimit in-kind contribution by this political committee within 10 business days (or at all, in this case), as required by state law. The Valley Professional Firefighters PAC has violated **RCW 42.17A.405(2)** and **WAC 390-16-310** with this illegal overlimit campaign contribution.

2) Failure to report candidate contributions made by PAC (Violation of RCW 42.17A.235)

Unfortunately, the Valley Professional Firefighters PAC has failed to disclose most of its candidate contributions made this year during the 2017 election cycle. Under **RCW 42.17A.235**, these contributions should have

been reported to the PDC on the PAC's campaign expenditure forms (C4s), but to this day, they have been hidden from the public. It is unclear how many campaign candidate donations have been hidden in this manner by the Valley Professional Firefighters PAC in violation of state law, but we are able to list some of these donations which were reported by the candidates who received these donations as follows:

Candidate	Donation Total	Date Reported	PDC Report #
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Nancy Backus	\$2000	July 7, 2017	100773652
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Larry Brown	\$500	July 9, 2017	100773199
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Manka Dhingra	\$250	Sept 22, 2017	100788469
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John W. Creighton III	\$100	July 17, 2017	100776102
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This totals \$2,850, at least, donated to candidates for their election campaigns in 2017, which have been hidden from the public, in violation of state law, by the Valley Professional Firefighters PAC. It appears likely, based on the pattern of behavior that there are other campaign contributions which have also not been disclosed by this Political Action Committee. **The obvious red flags these examples raise should encourage a much more thorough investigation into the history of profligate violations of Washington State's campaign finance laws by this committee.**

3) 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, it appears that the Valley Professional Firefighters PAC has failed on numerous occasions to do this, and it appears to be common practice at this committee. (See **Exhibit A - "Illegally late reported C3 and C4 reports"**)

The PDC should investigate the possibility that the Valley Professional Firefighters PAC committed the above violations willfully and 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

Valley Professional Firefighters PAC - Exhibit A - Illegally late reported C3 and C4 reports

report #	Type	Amended	Deposit Date	Due Date	Date Submitted	Days Late
100683827	C3	N	3/4/2015	4/10/2015	3/4/2016	329
100636870	C3	N	2/20/2015	3/10/2015	5/14/2015	65
100665993	C4	N		8/10/2015	10/28/2015	48
100665990	C3	N	9/7/2015	10/10/2015	10/28/2015	44
100665991	C3	N	9/18/2015	10/10/2015	10/28/2015	37
100636871	C3	N	3/20/2015	4/10/2015	5/14/2015	34
100645871	C4	N		6/10/2015	7/6/2015	26
100635126	C4	N		4/10/2015	5/6/2015	26
100645862	C3	N	5/15/2015	6/10/2015	7/6/2015	26
100645863	C3	N	5/14/2015	6/10/2015	7/6/2015	26
100656707	C3	N	8/21/2015	9/10/2015	9/11/2015	18
100672734	C4	N		11/10/2015	12/26/2015	16
100665997	C3	N	10/6/2015	11/10/2015	10/28/2015	16
100672732	C3	N	11/20/2015	12/10/2015	12/26/2015	16
100666003	C4	N		10/10/2015	10/28/2015	15
100650074	C4	N		7/10/2015	7/28/2015	14
100645869	C3	N	6/19/2015	7/10/2015	7/6/2015	14
100776265	C4	N		7/11/2017	7/20/2017	9
100665998	C3	N	10/16/2015	11/10/2015	10/28/2015	9
100780369	C4	N		7/25/2017	8/2/2017	8
100628104	C3	N	1/16/2015	2/28/2015	2/17/2015	7
100636872	C3	N	4/17/2015	5/11/2015	5/14/2015	3
100666197	C4	N		11/10/2015	10/29/2015	2
100714184	C3	N	7/29/2016	8/10/2016	8/3/2016	2
100630278	C4	N		3/10/2015	3/11/2015	1

Cumulative Days Late so far

811