

## File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported 8 days ago (Mon, 22 May at 10:19 AM) via Portal [Meta](#)  
To Whom it May Concern --

It has come to my attention that the Washington North Idaho District Council of Laborers PAC (WNIDLC-PAC) has committed numerous flagrant and egregious violations of **RCW 42.17A**.

### **1) Failure to timely file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)**

State law requires that candidates and committees file frequent, accurate, and timely reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, the WNIDLC-PAC failed on numerous occasions to do this. Additionally, they may have failed to timely deposit contributions within 5 business days. Please see **Exhibit A “Illegal Late Reported/Deposited Contributions”** and **Exhibit B “Illegally Late Reported Expenditures”**

Note that there may be other contributions received or expenditures made in a non-accurate or timely basis. The violations of this statute by WNIDLC-PAC appear to be commonplace. Compliance with the campaign finance laws appear to be treated as an afterthought, if they are considered much at all by this well-funded and experienced PAC. Please note that hundreds of thousands of dollars flow through this PAC, and based on their willful and common violations of the statute, it appears very likely that the only way to reconcile the truth in this case will be to subpoena bank statements and reconcile with the PDC filings.

For example, it should be noted that WNIDLC-PAC made a \$5000 contribution to the King County Democratic Party on or around April 10th, 2017 that has still not been reported on a C4. This report is severely late, and there are plenty more documented in the attached exhibits.

### **2) Failure to list committee officers. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.)**

The WNIDLC-PAC failed to list following individuals as officers, as required by **RCW 42.17A.205(2)(c)**:

Billy Wallace, Jr. – Political and Legislative Director for WNIDLC-PAC.

**WAC 390-05-245** defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee".

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

### **3) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C1-PC form. (Violation of RCW 42.17A.425)**

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."

I have reason to believe the following individuals have made illegal expenditures for the committee, in violation of state law:

Billy Wallace, Jr. – Political and Legislative Director for WNIDLC-PAC.

### Conclusion

WNIDLC-PAC has clearly engaged in rampant, egregious, and unmitigated violations of Washington State's campaign finance disclosure rules. There has been no consequences for this PAC's failure to even attempt to comply with the statute for many years now, so this lack of compliance with the law appears to be degrading even further. Additionally, it very well could be true that the WNIDLC-PAC may have engaged in money laundering, tax fraud, and other illegal activities. Only a full subpoena of **ALL** bank records and a forensic financial fraud investigation would be likely to uncover the true scope and spectrum of the illegal activity of this PAC.

The PDC should investigate the likelihood that the officers of WNIDLC-PAC committed the above violations maliciously, which is a class C felony per **RCW 42.17A.750 (2)(c)**. In particular, hiding or disguising the contributions received by the committee and the donations they made to other committees. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Best Regards,

Glen Morgan  
**1 Attachment**

• [XLSX](#)

[Exhibit A -B...](#)

( 10.4 KB )

**Exhibit A -- Illegal Late Reported/Deposited Contributions (WNIDCL - PAC)**

Violation #	Contribution date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
1	3/6/2015	4/10/2015	1/27/2016		292	\$25,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
2	3/26/2015	4/10/2015	1/27/2016		292	\$40.00 Unitemized.
3	6/29/2016	7/4/2016	2/13/2017		224	\$25,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
4	8/26/2016	8/29/2016	2/13/2017		168	\$25,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
5	4/8/2015	5/11/2015	10/9/2015		151	\$20,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
6	9/30/2016	10/3/2016	2/23/2017		143	\$18,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
7	9/11/2015	9/14/2015	1/27/2016		135	\$40,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
8	6/5/2015	6/8/2015	10/9/2015		123	\$25,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
9	5/7/2015	6/10/2015	10/9/2015		121	\$30,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
10	5/21/2015	6/10/2015	10/9/2015		121	\$10.00 Unitemized.
11	9/21/2015	9/28/2015	1/27/2016		121	\$113.00 Unitemized.
12	7/16/2015	7/20/2015	10/9/2015		81	\$20,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
13	12/21/2016	1/10/2017	2/23/2017		44	\$25,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
14	8/27/2015	8/31/2015	10/9/2015		39	\$15,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS
15	12/8/2015	1/11/2016	1/27/2016		16	\$25,000.00 WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS

**Exhibit B -- Illegally Late Reported Expenditures (WNIDCL - PAC)**

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
1							
2	3/23/2016	4/11/2016	2/23/2017	318	17TH LEGISLATIVE DISTRICT DEMOCRATS	\$ 5,000.00	CONTRIBUTION
3	4/28/2016	5/11/2016	2/13/2017	278	CURTIS KING FOR SENATE	\$ 1,000.00	CONTRIBUTION
4	5/17/2016	6/10/2016	2/13/2017	248	THE KENNEDY FUND	\$ 25,000.00	CONTRIBUTION
5	5/17/2016	6/10/2016	2/13/2017	248	THE HARRY TRUMAN FUND	\$ 50,000.00	CONTRIBUTION
6	6/13/2016	7/12/2016	2/13/2017	216	CLARK COUNTY DEMOCRATS	\$ 850.00	CONTRIBUTION
7	6/30/2016	7/12/2016	2/13/2017	216	WASHINGTON STATE DEMOCRATIC PARTY	\$ 50,000.00	CONTRIBUTION
8	7/20/2016	7/26/2016	2/13/2017	202	PEOPLE FOR PURCELL	\$ 1,000.00	CONTRIBUTION
9	7/20/2016	7/26/2016	2/13/2017	202	3RD LEGISLATIVE DISTRICT DEMOCRATS	\$ 5,000.00	CONTRIBUTION
10	7/20/2016	7/26/2016	2/13/2017	202	SPOKANE COUNTY DEMOCRATS	\$ 5,000.00	CONTRIBUTION
11	10/5/2016	10/18/2016	2/15/2017	120	5TH LEGISLATIVE DISTRICT DEMOCRATS	\$ 5,000.00	CONTRIBUTION