

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported 5 days ago (Wed, 10 May at 2:58 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that Roger Flygare has committed multiple violations of RCW 42.17A.

1) Illegal late reporting/deposit of campaign contributions. (Violation of RCW 42.17A.235)

State law requires that candidates submit regular, timely, accurate reports of campaign contributions. State law also requires that candidates timely deposit contributions within 5 business days of receipt.

Unfortunately, Flygare engaged in late reporting/deposit of campaign contributions in numerous instances. (See Exhibit A -- **Flygare illegally hidden contributions - late reporting**).

2) Illegal accepting of over-limit contributions. (Violation of RCW 42.17A.405, see WAC 390-17-305(2))

State law imposes certain limits on the amount of contributions that candidates can receive from various entities.

Flygare illegally accepted multiple over-limit contributions from in-kind contributors, namely Tiger Properties, LLC and Flygare and Associates,

LLC. (See Exhibit B -- **Flygare illegal overlimit contributions**). This is obviously illegal per state law.

3) Illegal failure to register Tiger Properties LLC and Flygare and Associates LLC as political committees, failure to report expenditures and contributions. (Violation of RCW 42.17A.205, RCW 42.17A.235, see RCW 42.17A.005(37))

State law requires that political committees register with the PDC within 14 days of receiving contributions or making expenditures, whichever is earlier. State law also requires that file regular, timely, accurate reports of campaign contributions and expenditures.

I believe that both Tiger Properties LLC and Flygare and Associates LLC meet the definition of a political committee per **RCW 42.17A.005(37)**. They must both immediately register as political committees and begin filing regular C3 and C4 reports, or face additional penalties from the PDC.

The PDC should investigate the possibility that Roger Flygare 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

2 Attachments

- **XLSX**
[Exhibit B - ...](#)
(10.3 KB)

- **XLSX**
[Exhibit A - ...](#)
(11.6 KB)

EXHIBIT A –Late Deposited/Reported Contributions

Note - Days late are approximate.

| Receipt Date | Due Date of C3 R | Date Reported | Dates Late | Amount | Contributor |
|--------------|------------------|---------------|------------|----------|----------------------------|
| 5/9/2015 | 6/10/2015 | 12/31/2015 | 204 | \$5.00 | TRUPPNER CHRIS |
| 5/12/2015 | 6/10/2015 | 12/31/2015 | 204 | \$12.00 | TRUPPNER CHRIS |
| 5/5/2015 | 6/10/2015 | 12/24/2015 | 197 | \$10.00 | Unitemized |
| 6/18/2015 | 6/22/2015 | 12/31/2015 | 192 | \$50.00 | DAVIS PAUL |
| 6/18/2015 | 6/22/2015 | 12/31/2015 | 192 | \$100.00 | PAYONK MARY |
| 6/19/2015 | 6/22/2015 | 12/31/2015 | 192 | \$100.00 | BANNISTER FRANK |
| 6/18/2015 | 6/22/2015 | 12/31/2015 | 192 | \$35.00 | Unitemized |
| 6/19/2015 | 6/22/2015 | 12/31/2015 | 192 | \$45.00 | Unitemized |
| 7/1/2015 | 7/6/2015 | 12/31/2015 | 178 | \$100.00 | LAPORTE PEGGY |
| 7/8/2015 | 7/13/2015 | 12/31/2015 | 171 | \$10.00 | Unitemized |
| 7/14/2015 | 7/20/2015 | 12/31/2015 | 164 | \$100.00 | AFFORDABLE HOUSING COUNCIL |
| 7/14/2015 | 7/20/2015 | 12/31/2015 | 164 | \$250.00 | MLK JR LABOR COUNCIL |
| 7/9/2015 | 7/13/2015 | 12/24/2015 | 164 | \$25.00 | Unitemized |
| 7/13/2015 | 7/20/2015 | 12/31/2015 | 164 | \$25.00 | Unitemized |
| 7/22/2015 | 7/27/2015 | 12/31/2015 | 157 | \$50.00 | GATES WILLIAM |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$300.00 | WARNKE BEVERLY |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$20.00 | BANNISTER FRANK |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$50.00 | GAGE ELBERT |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$50.00 | GAGE LINDA |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$30.00 | GRAYSON JAMES |
| 9/11/2015 | 9/14/2015 | 1/5/2016 | 113 | \$950.00 | PROPOSITION 1 CAMPAIGN |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$50.00 | BROOKS WALT |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$50.00 | DIRKS BRIAN |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$15.00 | FLYNN JERRY |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$15.00 | FLYNN LINDA |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$15.00 | ZANETTI JAMES |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$15.00 | ZANETTI NAOMA |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$135.00 | Unitemized |
| 9/10/2015 | 9/14/2015 | 1/5/2016 | 113 | \$75.00 | Unitemized |
| 9/17/2015 | 9/21/2015 | 1/5/2016 | 106 | \$40.00 | FRANKS DON |
| 9/17/2015 | 9/21/2015 | 1/5/2016 | 106 | \$30.00 | HURST JOHN |
| 9/17/2015 | 9/21/2015 | 1/5/2016 | 106 | \$20.00 | MALLORY PAUL |
| 9/17/2015 | 9/21/2015 | 1/5/2016 | 106 | \$25.00 | FLYNN JERRY |
| 9/17/2015 | 9/21/2015 | 1/5/2016 | 106 | \$25.00 | FLYNN LINDA |
| 9/17/2015 | 9/21/2015 | 1/5/2016 | 106 | \$10.00 | BROOKS WALT |
| 9/25/2015 | 9/28/2015 | 1/5/2016 | 99 | \$100.00 | SONG SHARI |
| 9/24/2015 | 9/28/2015 | 12/31/2015 | 94 | \$100.00 | FOSSOS JAMES |

| | | | | | |
|------------|------------|------------|----|----------|---|
| 9/24/2015 | 9/28/2015 | 12/31/2015 | 94 | \$65.00 | LAPORTE PEGGY |
| 10/1/2015 | 10/5/2015 | 1/5/2016 | 92 | \$450.00 | PACIFIC NORTHWEST REGIONAL COUNCIL OF CARPENTERS |
| 10/21/2015 | 10/26/2015 | 1/5/2016 | 71 | \$100.00 | DOTY J DY |
| 10/21/2015 | 10/26/2015 | 1/5/2016 | 71 | \$25.00 | Unitemized |
| 4/29/2015 | 5/11/2015 | 6/10/2015 | 30 | \$30.00 | MIN BYUNGKEUK |
| 4/24/2015 | 5/11/2015 | 6/10/2015 | 30 | \$40.00 | LEWIS CHRIS |
| 4/17/2015 | 5/11/2015 | 6/10/2015 | 30 | \$35.00 | CATALINA COURT REPORTING |
| 4/28/2015 | 5/11/2015 | 6/10/2015 | 30 | \$100.00 | BLANCHARD NORMA |
| 4/27/2015 | 5/11/2015 | 6/10/2015 | 30 | \$50.00 | CHEYNE DEBRA |
| 4/25/2015 | 5/11/2015 | 6/10/2015 | 30 | \$50.00 | FLYGARE MARVIN |
| 5/21/2015 | 6/10/2015 | 7/8/2015 | 28 | \$250.00 | UAPP LOCAL 32 |
| 5/4/2015 | 6/10/2015 | 7/8/2015 | 28 | \$25.00 | Unitemized |
| 6/26/2015 | 6/29/2015 | 7/20/2015 | 21 | \$100.00 | AFFORDABLE HOUSING COUNCIL |
| 6/22/2015 | 6/29/2015 | 7/20/2015 | 21 | \$250.00 | MLK JR. COUNTY LABOR COUNCIL COMMITTEE ON POLITICAL EDUCATION |
| 6/15/2015 | 6/22/2015 | 7/8/2015 | 16 | \$50.00 | HUGHEY JOHN |
| 7/6/2015 | 7/13/2015 | 7/28/2015 | 15 | \$50.00 | GATES WILLIAM |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$145.00 | PROCEEDS FROM LOW COST FUNDRAISER |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$25.00 | GAGE ELBERT |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$25.00 | GAGE LINDA |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$15.00 | FLYNN JERRY |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$15.00 | FLYNN LINDA |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$25.00 | GAGE ELBERT |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$25.00 | GAGE LINDA |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$15.00 | ZANETTI JAMES |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$15.00 | ZANETTI NAOMA |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$15.00 | GRAYSON JAMES |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$50.00 | BROOKS WALT |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$50.00 | DIRKS BRIAN |
| 9/11/2015 | 9/14/2015 | 9/24/2015 | 10 | \$950.00 | PROPOSITION 1 CAMPAIGN |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$300.00 | WARNKE BEVERLY |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$40.00 | NORTH CATHERINE |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$50.00 | BOSWORTH CRAIG |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$50.00 | STRUTHERS NANCY |
| 9/10/2015 | 9/14/2015 | 9/24/2015 | 10 | \$180.18 | Unitemized |
| 6/23/2015 | 6/29/2015 | 7/8/2015 | 9 | \$100.00 | WIGGINS KENNETH |
| 6/24/2015 | 6/29/2015 | 7/8/2015 | 9 | \$50.00 | OLLEE MILDRED W |
| 6/25/2015 | 6/29/2015 | 7/8/2015 | 9 | \$500.00 | PACIFIC NORTHWEST REGIONAL COUNCIL OF CARPENTERS |
| 6/25/2015 | 6/29/2015 | 7/8/2015 | 9 | \$25.00 | Unitemized |
| 7/8/2015 | 7/13/2015 | 7/20/2015 | 7 | \$25.00 | Unitemized |

| Contributor | Date | Amount | P/G | City | State | Zip | Description | |
|---------------------------------------|------------|--|-----|-------------|-------|-------|---------------------------------|--|
| TIGER PROPERTIES LLC | 2015-04-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | OFFICE SPACE | |
| TIGER PROPERTIES LLC | 2015-05-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | OFFICE SPACE | |
| TIGER PROPERTIES LLC | 2015-06-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | OFFICE SPACE | |
| TIGER PROPERTIES LLC | 2015-07-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | JULY RENT | |
| TIGER PROPERTIES LLC | 2015-08-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | AUGUST RENT | |
| TIGER PROPERTIES LLC | 2015-09-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | SEPTEMBER RENT | |
| TIGER PROPERTIES LLC | 2015-10-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | OCTOBER RENT | |
| TIGER PROPERTIES LLC | 2015-11-01 | \$ 500.00 | N | FEDERAL WAY | WA | 98003 | NOVEMBER RENT | |
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| Total in-kind contributions accepted: | \$4,000.00 | This exceeds applicable contribution limit of \$1900 by \$2100. | | | | | | |
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| FLYGARE AND ASSOCIATES | 2015-04-10 | \$ 2,858.20 | N | FEDERAL WAY | WA | 98003 | YARDS SIGNS AND REMITS | |
| FLYGARE AND ASSOCIATES | 2015-04-20 | \$ 51.45 | N | FEDERAL WAY | WA | 98003 | POSTAGE | |
| FLYGARE AND ASSOCIATES | 2015-05-01 | \$ 20.00 | N | FEDERAL WAY | WA | 98003 | POSTAGE | |
| FLYGARE AND ASSOCIATES | 2015-05-01 | \$ 20.00 | N | FEDERAL WAY | WA | 98003 | POSTAGE | |
| FLYGARE AND ASSOCIATES | 2015-05-01 | \$ 2.50 | N | FEDERAL WAY | WA | 98003 | POSTAGE | |
| FLYGARE AND ASSOCIATES | 2015-05-01 | \$ 2.50 | N | FEDERAL WAY | WA | 98003 | POSTAGE | |
| FLYGARE AND ASSOCIATES | 2015-05-23 | \$ 1,410.32 | N | FEDERAL WAY | WA | 98003 | FOOD FOR CAMPAIGN KICKOFF EVENT | |
| FLYGARE AND ASSOCIATES | 2015-05-23 | \$ 53.99 | N | FEDERAL WAY | WA | 98003 | CAKE FOR CELEBRATION | |
| FLYGARE AND ASSOCIATES | 2015-05-23 | \$ 53.99 | N | FEDERAL WAY | WA | 98003 | CAKE FOR CAMPAIGN KICKOFF EVENT | |
| FLYGARE AND ASSOCIATES | 2015-05-23 | \$ 5.89 | N | FEDERAL WAY | WA | 98003 | FOOD | |
| FLYGARE AND ASSOCIATES | 2015-06-26 | \$ 95.23 | N | FEDERAL WAY | WA | 98003 | MAILING LABELS | |
| FLYGARE AND ASSOCIATES | 2015-06-27 | \$ 39.51 | N | FEDERAL WAY | WA | 98003 | STAKES BLACK SPRAY PAINT | |
| FLYGARE AND ASSOCIATES | 2015-07-01 | \$ 394.56 | N | FEDERAL WAY | WA | 98003 | BANNERS AND T-SHIRTS | |
| FLYGARE AND ASSOCIATES | 2015-07-01 | \$ 64.45 | N | FEDERAL WAY | WA | 98003 | CANDY | |
| FLYGARE AND ASSOCIATES | 2015-07-03 | \$ 57.48 | N | FEDERAL WAY | WA | 98003 | WATER AND DRINKS | |
| FLYGARE AND ASSOCIATES | 2015-07-03 | \$ 14.24 | N | FEDERAL WAY | WA | 98003 | BUBBLE GIVEAWAYS FOR PARADE | |
| FLYGARE AND ASSOCIATES | 2015-07-04 | \$ 54.75 | N | FEDERAL WAY | WA | 98003 | BUBBLE GIVEAWAYS FOR PARADE | |
| FLYGARE AND ASSOCIATES | 2015-10-08 | \$ 67.47 | N | FEDERAL WAY | WA | 98003 | WOOD STAKES FOR SIGNS | |
| FLYGARE AND ASSOCIATES | 2015-10-10 | \$ 44.49 | N | FEDERAL WAY | WA | 98003 | WOOD STAKES FOR SIGNS | |
| | | | | | | | | |
| Total in-kind contributions accepted: | \$5,311.02 | This exceeds applicable contribution limit of \$1900 by \$3411.02. | | | | | | |