

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported a day ago (Thu, 13 Apr at 6:44 AM) via Portal Meta

To Whom it May Concern –

It has come to my attention that the 45th Legislative District Democrats have violated provisions of RCW 42.17A.

1) Failure to timely file accurate 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 45th Legislative District Democrats failed on numerous occasions to do this.

a) According to the PDC, the C4 for the time period covering May 2015 was due on 6/10/15.

The 45th Legislative District Democrats' original report failed to report a \$180 expenditure for “T-shirts”, and an \$80 expenditure for “button making supplies”.

Unfortunately, the 45th Legislative District Democrats failed to file an accurate C4 until 1/10/16, **WELL past the statutory deadline.**

Additionally, I will note that the original C4 for this time period was submitted 4 days past the deadline.

b) According to the PDC, the C4 for the time period of 7/28/15 to 8/31/15 was due on 9/10/15.

The 45th Legislative District Democrats' original report failed to include two \$25 in-kind contributions from Robin and Christopher Barnes for an entrance fee for the Woodinville parade.

Unfortunately, the 45th Legislative District Democrats failed to file an accurate C4 until 10/14/2015, well past the statutory deadline.

c) According to the PDC, the C4 for the time period of 7/14/15 to 7/27/15 was due on 7/28/15.

The 45th Legislative District Democrats' original report (filed 7 days late on 8/4/2015) failed to include a \$541.18 in-kind contribution from Jeanne Large. The in-kind contribution was for printing a LD45 endorsement guide.

Unfortunately, the 45th Legislative District Democrats failed to file an accurate C4 until 10/14/15, well past the statutory deadline.

d) According to the PDC, the C3 for the time period of January 2017 was due on 2/10/17.

The 45th Legislative District Democrats' original report (filed 1 day late on 2/11/2017) failed to include a refund from VANTIV ECCOMMERCE valued at \$45.

Unfortunately, the 45th Legislative District Democrats failed to file an accurate C4 until 3/1/17, well past the statutory deadline.

e) According to the PDC, the C4 for the time period of January 2017 was due on 2/10/17.

The 45th Legislative District Democrats' original C4 failed to include the accurate value of expenditures made to VANTIV ECCOMMERCE. The original C4 has two payments off from the accurate amount by nearly a dollar.

Unfortunately, the 45th Legislative District Democrats failed to file an accurate C4 until 2/13/17, well past the statutory deadline.

It defies credulity to believe that Shawn Roland is unable to report the accurate amount of money sent to this vendor in a timely manner. The grace period for reporting C4s (10 days after the last day of the previous month) should be more than enough time for him to get the accurate amounts reported. If he is unable to fulfill his responsibilities as Treasurer, it might be helpful if Shawn Roland attend additional PDC training courses to avoid these mistakes in the future.

f) The 45th Legislative District Democrats illegally reported the following contribution:

LAKE WASHINGTON SCHOOL DISTRICT 5/9/2016 \$400.00 N REDMOND WA

The Lake Washington School District did not make a contribution to their committee. Additionally, if the District had actually contributed, they would have surpassed **the contribution limit for governmental agencies to political committees (limit is \$0)**, and the 45LD Democrats would have had to refund the contribution within 10 business days, which they failed to do. They should amend their C3 to fix this error 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. 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.

45th Legislative District Democrats illegally failed to report the following debts on preceding C4s:

| Vendor | Date | Amount | Description | Debt Not Reported |
|---|------------|---------|--|--|
| TRADE PRINTERY | 2016-10-17 | 4000 | 2016 GENERAL ELECTION ENDORSEMENT GUIDES | This should have been reported as debt on post-primary C4. |
| TRADE PRINTERY | 2016-10-19 | 2444.28 | PRINTING AND MAILING 2016 GENERAL ELECTION VOTER GUIDES | This should have been reported as debt on 21 day pre general C4. |
| LOSCHEN MATT | 2016-04-19 | 1997 | REIMBURSEMENT FOR RENTING SCHOOLS FOR 2016 PRECINCT CAUCUS | This should have been reported as debt on C4 covering March. |
| KING COUNTY DEMOCRATS | 2016-05-02 | 600 | 2016 DUES | This should have been reported as debt on C4 covering April, and likely other previous months. |
| JUANITA HIGH SCHOOL | 2016-04-20 | 520 | RENT FOR LEGISLATIVE DISTRICT CAUCUS SPACE | This should have been reported as debt on C4 covering March. |
| NORTHSHORE SCHOOL DISTRICT | 2016-04-06 | 444 | RENTAL OF TIMBERCREST AND LEOTA JUNIOR HS FOR CAUCUS | This should have been reported as debt on C4 covering March. |
| REDMOND HIGH SCHOOL | 2016-03-16 | 400 | 2016 LD CAUCUS SITE RENTAL | This should have been reported as debt on C4 covering February. |
| WOODINVILLE CHAMBER OF COMMERCE | 2016-07-29 | 300 | 2016 PARADE AND BOOTH FEE | This should have been reported as debt on 7 day pre primary C4. |
| CITY OF REDMOND | 2016-08-24 | 287.13 | GENERAL MEETING ROOM RENTAL | This should have been reported as debt on post-primary C4. |
| LAKE WASHINGTON SCHOOL DISTRICT | 2016-02-23 | 260 | 2016 PRESIDENTIAL PRECINCT CAUCUS SITE RENTAL | This should have been reported as debt on C4 covering January. |
| CITY OF REDMOND | 2016-04-04 | 255 | RENTAL FEE FOR APRIL GENERAL MEETING SPACE | This should have been reported as debt on C4 covering March. |
| OLD REDMOND SCHOOL HOUSE COMMUNITY CENTER | 2016-04-13 | 255 | RENT FOR MAY GENERAL MEETING SPACE | This should have been reported as debt on C4 covering March. |

3) Failure to properly break down expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205)

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**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

The 45th Legislative District Democrats illegally failed to break down the following expenses:

| Vendor | Date | Amount | Description | Expenses not broken down |
|-------------------|------------|---------|---|--|
| TRADE PRINTERY | 2016-10-19 | 2444.28 | PRINTING AND MAILING 2016 GENERAL ELECTION VOTER GUIDES | Failure to break down printing and postage expenditures separately. |
| LOSCHEN MATT | 2016-04-19 | 1997 | REIMBURSEMENT FOR RENTING SCHOOLS FOR 2016 PRECINCT CAUCUS | Failure to list the actual entity receiving the payment that the reimbursement was made for. |
| ALBINGER KEN MR | 2016-12-15 | 212.55 | REIMBURSEMENT FOR PURCHASING PAPER AND INK FOR 2016 PRIMARY ELECTION VOTER GUIDES | Failure to list the actual entity receiving the payment that the reimbursement was made for. |
| BARNES ROBIN MS | 2016-09-28 | 150 | BUTTONS FOR WOODINVILLE FESTIVAL | Failure to list the actual entity that provided the buttons. |
| WILSON DORIS E MS | 2016-12-20 | 127.2 | REIMBURSEMENT FOR FOOD AND DRINKS FOR 2016 HOLIDAY PARTY | Failure to list the actual entity receiving the payment that the reimbursement was made for. |
| OLSEN BARB | 2016-11-01 | 119.87 | REIMBURSEMENT FOR SUMMER PICNIC FOOD | Failure to list the actual entity receiving the payment that the reimbursement was made for. |

They must amend their C4s immediately to correct this problem.

4) Failure to report expenditure/in-kind contribution for mailing list. (Violation of RCW 42.17A.235)

As evidenced by the expenditure below, the 45th Legislative District Democrats sent out mailers to registered voters within the 45th Legislative District:

TRADE PRINTERY 10/19/2016 \$2,444.28 PRINTING AND MAILING 2016 GENERAL ELECTION VOTER GUIDES

The 45th Legislative District Democrats used mailing lists to target specific voters in an effort to win the maximum number of votes per dollar spent.

Mailing lists have real market value, and many committees actually pay hundreds of dollars for mailing lists from vendors such as L2.

Unfortunately, because the 45th Legislative District Democrats failed to report the expenditure for said mailing lists, or the in-kind contribution of mailing lists from some outside entity, they are in violation of **RCW 42.17A.235**.

The 45th Legislative District Democrats must amend their C4 reports to include the source of their mailing lists, either as an in-kind contribution or as an expenditure.

5) Failure to report last minute contributions. (Violation of RCW 42.17A.265)

The 45th Legislative District Democrats failed to report a last minute contributions (@ aggregate of \$1000 or higher) from the following group within the 48 hour time limit on an LMC form, as required by law:

a. General Election (21 Days -- 10/18/2016 or later)

- Received a LMC valued at \$1350 from "Eastside Democratic Dinner" on 10/20/16, wasn't reported until 10/28/16.

The PDC should investigate the possibility that the 45th Legislative 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 immediately refer this matter to the Attorney General's office for criminal prosecution.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan