

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported 15 hours ago (Wed, 15 Mar at 1:34 AM) via Portal Meta

To Whom it May Concern --

It has come to my attention that Manka Dhingra has committed yet further violations of RCW 42.17A in her campaign for State Senate.

1) Failure to report in-kind contribution. (Violation of RCW 42.17A.235 (1))

On her original C1 (filed 2/13/17), Dhingra lists "PO Box 2467 Redmond, WA 98052" as her Committee's mailing address.

The purchase cost of this PO Box is required to have been listed as an in-kind contribution from the person who purchased it for the campaign. Unfortunately, this has not happened.

Dhingra has had three distinct opportunities to report this on the C4 form, but has failed to do so: a) on the same day she filed her C1 (which is the statutory requirement), b) when she filed her first C4 on 2/17/17 covering the month of February, and c) when she filed her amended C4 on 3/10/17.

This in-kind contribution was statutorily obligated to have been reported on 2/13/17, making it roughly 30 days late.

2) Reporting inaccurate date of when debt was incurred, late reporting of debt, inaccurate reporting of amount of debt. (Violation of RCW 42.17A.235, .240)

The following debts (with the exception of the last one -- e) should have been reported on 2/13/17 (the day Dhingra submitted her C1). Unfortunately, they were not reported until 3/10/17, making them severely late.

a) Brian DalBalcon Photography -- \$600 -- Photography -- 2/27/17

This is demonstrably inaccurate because Dhingra had DalBalcon's professional photography on her website and FB page when she announced on 2/13. This is a fictitious date. Dhingra must amend this report to include the accurate date the debt was actually incurred. Dhingra is likely trying to hide the actual date that this debt was incurred, because it will show that she "became a candidate" much earlier than originally reported to the PDC.

b) Northwest Passage Consulting -- \$1314.15 -- Political Consulting -- 2/28/17

It is extremely unlikely that Dhingra obligated her campaign to pay Sinderman on the final day of the reporting period. In all likelihood, Dhingra had retained Sinderman many months earlier. This debt to Sinderman should have been reported on the same day she filed her 2/13/17 C1. Additionally, there is no way that Sinderman would agree to provide consulting services to this campaign for this small amount of money. This is a deceptive attempt to misreport the accurate amount of a debt. What was reported is likely only a small installment of what Dhingra will pay Sinderman. Dhingra must update this C4 immediately to show the accurate amount of money that her campaign is obligated to pay Sinderman, and when the debt was actually incurred. Dhingra is likely trying to hide the actual date that this debt was incurred, because it will show that she "became a candidate" much earlier than reported to the PDC.

c) Katherine Bobman -- \$2685.00 -- Fundraising Consulting -- 2/28/17

Again, the date that is reported for this debt is demonstrably fictitious. When Dhingra filed her initial C1, she listed Bobman's cell phone number (425-270-8660) as the contact. This shows that Bobman has been providing campaign services to Dhingra from the very beginning of her campaign. As such, it should have been reported as debt immediately when Dhingra filed her C1. Bobman is a campaign worker with a long history of receiving payment for her services, as demonstrated here: <http://web.pdc.wa.gov/MvcQuerySystem/AdvancedSearch/ExpendituresData?spender=ALL&electionYear=ALL&dateFrom=&dateThru=&amountFrom=&amountThru=&committeeType=IGNORE&city=&state=&zip=&vendor=bobman&description=>

As such, any services she provides to Manka cannot possibly be on a volunteer basis, and should have been reported immediately, either as an in-kind contribution **OR** as debt. Furthermore, it defies credulity to believe that Bobman would agree to work on Dhingra's campaign for such little money. For reference, Bobman was paid \$46,163.36 for her work on the Cyrus Habib Lt. Gov campaign. The 45th district race will likely be on the same scale as the Lt. Gov's 2016 race, and the estimated debt of \$2685 is completely fictitious. Dhingra must update her C4 immediately to show the accurate amount of money her campaign intends to pay Bobman, as well as the accurate date the debt was incurred. Dhingra is likely trying to hide the actual date that this debt was incurred, because it will show that she "became a candidate" much earlier than what she told the PDC.

d) Andy Lo -- \$500 -- Treasury Services -- 2/28/17

The date listed here is clearly fictitious. Andy Lo was listed as the Treasurer by Dhingra when she initially filed her C1. This shows that Andy Lo has been providing campaign services to Dhingra from the very beginning of her campaign. As such, this debt should have been reported immediately when Dhingra filed her C1. Moreover, the estimated payment is fictitious -- her campaign intends to pay much more than this to Andy Lo for the entire campaign. Dhingra must update her C4 immediately to show the accurate amount of money her campaign intends to pay Andy Lo, as well as the accurate date the debt was incurred. Dhingra is likely trying to hide the actual date that this debt was incurred, because it will show that she "became a candidate" much earlier than what was reported to the PDC.

e) Sage -- \$1418.56 -- Merchant Services -- 2/28/17

Again, this is likely not the accurate date (or description for that matter) for the debt. Merchant services typically take a portion of the donations received by a campaign, but there are no indications that this "debt" was incurred on 2/28. It was likely incurred much earlier.

3) Failure to file accurate C3 (Violation of RCW 42.17A.235, .750 (2)(c))

Dhingra's campaign originally filed a falsified C3 (**ref. no. 100749279**) on 2/17/17 in a fraudulent attempt to make it appear that she had raised more money than was true.

On the original C3, Dhingra had recorded receiving two contributions from Maninder Singh valued at \$1000 (\$2000 aggregate). In reality, Maninder had only contributed \$1000.

The original falsified report was filed 4 days late, and an accurate report was not submitted until 3/10/17, making it extremely late. It was due on 2/13/17.

4) Fraudulently filing C4 for the incorrect period. (Violation of RCW 42.17A.235, .240, see WAC 390-16-041)

State law requires that candidates file frequent, accurate reports with the PDC prior to the statutory deadline.

In addition to being 4 days late, the C4 Dhingra submitted on 2/17/17 identified the incorrect end date of the reporting period, a violation of **RCW 42.17A.240** and **WAC 390-16-041**.

While Dhingra did modify the beginning date of the report period to 2/3/17, she neglected to change the end date for that particular C4 to 2/17/17, as required by statute. Unfortunately, the "end date" for the C4 was illegally entered as 2/28/17, which was inaccurate. Since 2/28 was still many days away (and because her campaign was making other expenditures during that period), Dhingra illegally submitted a C4 with a fraudulent reporting period selected.

This is an error that Dhingra needs to address in the future. A casual public observer would assume that a C4 submitted on 2/17 for the entire month of February would mean that Dhingra didn't intend to engage in any additional expenditures for the remainder of the month. Obviously, this was not the case.

5) Inaccurate, fraudulent dates for expenditures, in-kind contributions. (Violation of RCW 42.17A.235, .240)

State law requires that candidates file frequent, accurate reports with the PDC prior to the statutory deadline. These reports must include the accurate date that expenditures were made, in addition to the dates that debts were incurred and in-kind contributions were received.

Unfortunately, the Dhingra campaign appears to be flagrantly violating this requirement by entering random "guesses" as the statutorily required accurate dates for expenditures and in-kind contributions. Here are a few instances:

a) On Dhingra's 2/17/17 C4, she listed the \$960 owed to NGP Van as debt incurred on 2/6/17. Then, on 3/10/17, she reports this amount as having been paid on 2/15/17, which was two days before she filed her initial C4.

This is impossible. Dhingra can't have it both ways -- either the 2/17/17 C4 was inaccurate, or the 3/10/17 C4 was inaccurate. Either way, a violation of state law has been committed.

b) On Dhingra's original 2/17/17 C4, she listed an expenditure to Anedot on 2/7/17 for \$357.97.

It wasn't until Dhingra submitted her 3/10/17 C4 when she switched the date for this same transaction to 2/9/17. This change was made well past the statutory deadline of 2/13/17.

c) On Dhingra's original 2/17 C4, she listed an expenditure to Anedot on 2/9/17 for \$441.15.

It wasn't until Dhingra submitted her 3/10/17 C4 when she switched the date for this same transaction to 2/9/17. This change was made well past the statutory deadline of 2/13/17.

d) On Dhingra's original 2/17 C4, she listed an expenditure to Anedot on 2/12/17 for \$312.37.

It wasn't until Dhingra submitted her 3/10/17 C4 when she switched the date for this same transaction to 2/15/17. This change was made well past the statutory deadline.

e) On her 3/10 C4, Dhingra listed an in-kind contribution from Megan Bishop on 2/13/17 valued at \$1020.00 for Website design.

This is a fictitious date -- Dhingra should amend the report to include the actual date that Bishop began work on Dhingra's website. Dhingra is likely trying to hide the actual date that work began, because it will show that she "became a candidate" much earlier than what she told the PDC.

A thorough PDC investigation will determine that Dhingra's campaign has systemically reported incorrect dates for expenditures and in-kind contributions.

6) Late reporting of expenditures, in-kind contributions, debt. (Violation of RCW 42.17A.235, .240)

State law requires that candidates file frequent, accurate reports with the PDC prior to the statutory deadline.

a) The following expenditure should have been reported on Dhingra's initial 2/17/17 C4, but was not reported until 3/10/17, making it nearly a month late:

NGP VAN 2/15/2017 \$960.00 WASHINGTON DC 20005 DATABASE SERVICE

b) On Dhingra's original 2/17 C4, she failed to list an expenditure to Anedot on 2/16/17 for \$275.97. It was not reported until 3/10/17, well past the statutory deadline.

c) On Dhingra's original 2/17 C4, she failed to list an expenditure to NGP Van on 2/15/17 for \$960.00. It was not reported until 3/10/17, well past the statutory deadline.

d) On Dhingra's original 2/17 C4, she failed to list a 2/13/17 in-kind contribution from Megan Bishop valued at \$1020.00 for Website design. It was not reported until 3/10/17, well past the statutory deadline.

Dhingra's campaign failed to report the above information in a timely manner, as required by state law.

7) Failure to include sponsor ID on donation page. (Violation of RCW 42.17A.320(1))

State law requires that sponsor ID (and address) be included on all written political advertising.

Web pages (including donation pages) fall under the statutory definition of written political advertising and are therefore required to bear sponsor ID and address.

Dhingra failed to do this for her website's donation page. (See attached).

By not including this important information on her donation page, Dhingra has violated **RCW 42.17A.320(1)**.

8) Failure to include party affiliation in Sponsor ID statement on blast e-mail. (Violation of RCW 42.17A.320(1))

On 3/14/17, Dhingra's campaign sent out an e-mail requesting support that was allegedly from Jay Inslee.

The e-mail was paid for by Dhingra's campaign committee. While it included the appropriate "paid for by" statement, it neglected to include partisan affiliation.

This is a violation of state law.

9) Failure to disclose offices held. (Violation of RCW 42.17A.700, see WAC 390-24-010, 150)

State law requires that candidates disclose the offices that they hold on corporations.

Manka Dhingra -- by her own admission -- is a board member of NAMI Eastside. She is even listed as an officer on their corporate form on file with the Secretary of State. (See attached)

Unfortunately, she failed to report this on her F1, which is a violation of state law. There may be other offices held that Dhingra failed to report as well.

10) Failure to accurately disclose ownership of a PERS retirement account as an asset. (Violation of RCW 42.17A.700, see WAC 390-24-010)

State law requires that candidates disclose the assets that they own on their F1 personal finance affairs statement, if they are over a certain value.

Dhingra failed to report the value of her PERS retirement account, which is an asset.

The value of Dhingra's PERS retirement account is almost certainly over the statutory reporting threshold of \$2400, as she is a longtime public employee of the King County Prosecutor's office.

Dhingra must be required to amend this form immediately to include accurate information.

I urge the PDC and AG to investigate these allegations immediately.

Best Regards,

Glen Morgan

3 Attachments

- jpg

[InsleeDhingr...](#)

(164 KB)

- pdf

[Elect Manka ...](#)

(358 KB)

- pdf

[DhingraCorpo...](#)

(67.2 KB)



Dear Friend,

I'll always be the first to say that state governments affect real change.

And, now more than ever, it's incredibly important that we ensure our state government will fight for every Washingtonian. We need to make sure that our Washington values are protected every step of the way. We need strong, progressive leaders who will work for us.

That's why I'm endorsing Manka Dhingra for the 45th Legislative District Senate seat. Manka has repeatedly shown that she never gives up when it comes to protecting Washingtonians' rights. Her experience and success protecting safety and rights at the King County Prosecuting Attorney's Office and her dedication in the community standing up for women and families makes it clear to me that she is the right woman for the job. I urge you to join me in standing with her!

[Join me in supporting Manka Dhingra for the 45th Legislative District Senate seat!](#)

Manka Dhingra has worked throughout her career to improve the lives of people with mental illness, protect women from domestic violence, and stand up for immigrant rights. I have no doubt that she is someone we can rely on to protect those values in the 45th District.

The fights we've taken on during the 2017 Legislative Session are proof we need Democrats like Manka in the Senate. Democrats are just one seat away from taking back the Senate. It's critical to win if we want to push forward the agenda I set forth during my second inaugural address.

I hope you'll join me in supporting her.

[Sign on to endorse Manka Dhingra for the 45th Legislative District Senate seat today.](#)

Thank you for doing your part.

Very truly yours,

Jay Inslee

SIGN ON »

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PO Box 2467
Redmond, WA 98052



Elect Manka Donation Page

Thank you for your support!

The maximum donation is \$2,000 per person and \$4,000 per couple.

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Contact Information

First Name

First Name is required.

Last Name

Last Name is required.

Address

Address is required.

Zip Code

Zip Code is required.

City

City is required.

State

WA

Email Address

Email Address is required.

Home Phone

Employer Information

This information is required by law. If you are contributing with your spouse, please include their employment information in addition to their full name.

Occupation

Employer

Spouse Name (Optional)

City

State

- State -

If you are self-employed, please list the name of the entity that is on your paycheck, and please list your line of work. "Business Person" is not acceptable, please enter the type of business instead.

We respectfully request that Partners of Partnerships and Members of LLC's contribute individually, instead of through their respective business entity.

Contribution Information

<input type="radio"/> \$50	<input type="radio"/> \$100	<input type="radio"/> \$250	<input type="radio"/> \$1,000
<input type="radio"/> \$2,000	<input type="radio"/> \$4,000	<input type="text" value="\$0.00"/>	

Payment Information

Card Number	Expiration Date
<input type="text" value="....."/>	<input type="text" value="MM / YY"/>

Update my **FastAction** profile with this information.

Contribute

By clicking on the "Contribute" button you confirm that the following statements are true and accurate:

- I am a United States citizen or a legal permanent resident alien.
- This contribution is made from my own funds, and not those of another.
- This contribution is not made from the funds of a corporation or labor organization.
- This contribution is made on a personal credit card or debit card for which I have the legal obligation to pay, and is not made either on a corporate or business entity card or on the card of another person.

- I am at least eighteen years old.

Contributions or gifts are not tax deductible.

 Powered by [NGP VAN](#)

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i We are experiencing higher-than-normal call volumes and business filings. We appreciate your patience as we do our best to service every customer as quickly as possible.



NAMI EASTSIDE

UBI Number	602091647
Category	REG
Profit/Nonprofit	Nonprofit
Active/Inactive	Active
State Of Incorporation	WA
WA Filing Date	01/12/2001
Expiration Date	01/31/2018
Inactive Date	
Duration	Perpetual
Charity	This corporation is also a charity. View Info » (http://www.sos.wa.gov/charities/search_detail.aspx?charity_id=27296)
Registered Agent Information	
Agent Name	NAMI EASTSIDE
Address	16315 NE 87TH ST #A-9
City	REDMOND
State	WA
ZIP	980520000
Special Address Information	
Address	
City	
State	
Zip	

Governing Persons (as defined in RCW 23.95.105 (12) (http://app.leg.wa.gov/RCW/supdefault.aspx?cite=23.95.105))

Title	Name	Address
Governor	Dhingra, Manka	,
Governor	Bradshaw Jacula, Brooke	,
Governor	Campbell, Lyndsay	,
Governor	Graves, Clark	,