

# File a Formal Complaint - Glen Morgan

Glenmorgan89 reported a day ago (Mon, 6 Mar at 1:15 AM) via Portal Meta

To Whom it May Concern --

It has come to my attention that Dana Ralph (formerly Dana Stober) -- a 2017 candidate for Kent City Mayor -- has committed numerous violations of **RCW 42.17A**. It should be noted that she is related to, and is intimately involved with, Bailey Stober (a campaign consultant and serial violator of PDC rules and campaign finance laws)

***Please note these are unique and separate violations from the many violations of campaign finance law committed by Ralph/Stober during the 2015 election cycle.***

## **1) Failure to timely file C3 & C4 reports on day C1 is filed, failure to report contributions. (Violation of RCW 42.17A.235(1))**

State law requires that candidates submit reports containing all contributions received and expenditures made on the same day they submit their statement of registration (C1).

Ralph filed her C1 on 3/9/2016, however, she failed to report having received a 3/8/16 contribution from her 2015 City Council campaign committee valued at \$100.

Ralph also failed to report receiving a contribution from her 2015 City Council campaign on 11/29/2016, valued at \$6,415.00.

Her campaign has STILL not reported having received these contributions, making her significantly late.

Additionally, she failed to list her expenditure/in-kind contribution/debt for her campaign's PO Box (PO Box 6042) until 8/11/16.

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

a) According to the PDC, the C4 for the time period of 6/1/16 to 6/31/16 was due on 7/10/16.

Unfortunately, Ralph failed to file this C4 until 7/11/16, well past the statutory deadline.

## **3) Accepting over-limit contribution from candidate authorized committees, failure to return over-limit contributions within 10 calendar days. (Violation of RCW 42.17A.405, see WAC 390-16-312)**

Dana Ralph accepted the following illegal and overlimit donations from candidate authorized non-surplus fund committees:

3/8/2016 -- \$100 from 2015 Ralph Council Committee  
11/29/2016 -- \$6415 from 2015 Ralph Council Committee

Additionally, Dana Ralph failed to return these illegal over-limit contributions within 10 calendar days, which is a separate and independent violation.

## **4) 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.

Unfortunately, Ralph failed to report the following expenditures as debt on previous C4s:

RALPH DANA L 8/11/2016 \$86.00 KENT WA 98064 PO BOX

On her C1 filed on 3/28/16, Ralph listed her campaign's PO Box as "PO Box 6042", however she completely failed to report this as an expenditure, in-kind contribution, or debt. She also failed to do this on subsequent C4s.

Because this "debt" was more than 30 days old, this is a violation, even though the amount does not exceed \$250.

**5) Failure to list Bailey Stober and Doug Scharnhorst as committee officers. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245)**

Ralph's committee failed to list Bailey Stober and Doug Scharnhorst as officers on their C1 form, which is required by RCW 42.17A.205(2)(c). Stober made strategic campaign decisions (and does consulting) for the campaign and Scharnhorst was the CFO/Treasurer.

Bailey Stober and Doug Scharnhorst should have been listed as committee officers, because they, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

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 be aware that Dana Ralph (then Dana Stober) correctly listed Bailey Stober as her campaign manager during her 2007 unsuccessful bid for Kent City Council, so she is familiar with the requirements of state law. (See attached C1 from 2007.) Unfortunately, she has chosen to ignore those requirements in this instance.

**6) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C1 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..."

Because Bailey Stober and Doug Scharnhorst are officers for the committee – despite not being listed on the form – this is a violation. In their roles as strategic consultant and campaign treasurer/CFO respectively, these two individuals doubtlessly made illegal expenditures for the Committee.

**7) Failure to report in-kind contribution of campaign management. (Violation of RCW 42.17A.235)**

State law requires that candidates report expenditures, inkind contributions, and debt on their regular C4 reports.

Ralph failed to report the in-kind value of receiving campaign management and consulting services from Bailey Stober. Stober is providing campaign management and consulting services to Ralph for her mayoral campaign.

As you can see from this link, Bailey has frequently furnished campaign management and consulting services to other candidates, so it clearly has a market value that is required to be reported as an in-kind contribution and does not fall under volunteer

services: <http://web.pdc.wa.gov/MvcQuerySystem/AdvancedSearch/ExpendituresData?spender=ALL&electionYear=ALL&committeeType=IGNORE&vendor=Stober&orderBy=vendor-asc>

#### **8) Failure to properly describe expenses. (Violation of RCW 42.17A.235)**

State law requires that candidates accurately describe expenses. Unfortunately, Ralph failed to do this in the following instances:

RALPH DANA L 4/8/2016 \$97.00 KENT WA 98064 GO DADDY -- Too vague: fails to identify what the payment to GoDaddy was made for.

RALPH DANA L 4/8/2016 \$70.00 KENT WA 98064 USPS -- Too vague: fails to identify what was purchased from USPS.

RALPH DANA L 4/8/2016 \$50.45 KENT WA 98064 STAPLES - KICKOFF -- Too vague: fails to identify what was purchased at staples for the kickoff.

#### **9) Failure to include the accurate address of an in-kind contributor. (Violation of RCW 42.17A.235, .240)**

Ralph failed to report the accurate address for the following in-kind contribution:

WHTTE JIM 4/1/2016 \$600.00 P MESA WA 95215 RETIRED KICK OFF RECEPTION

There is no-one by the name of Jim White in the town of Mesa, WA -- a small close-knit agricultural community of 500 in Franklin County Washington. It is likely that the treasurer intended to reference the (much larger) community of Mesa in Arizona.

I urge the PDC to investigate these allegations immediately.

Best Regards,

Glen Morgan

#### **1 Attachment**

- pdf

[2007DanaStob...](#)

( 73.2 KB )



# Candidate Registration

# C1

(3/06)

## DATE FILED PDC

MAR 16 2007

Candidate's Name (Give candidate's full name.) <i>Dana Suzanne Stober</i>		Telephone Number <i>(253) 520-2469</i>
Candidate's Committee Name (Do not abbreviate.) <i>Elect Dana Stober Campaign</i>		Fax Number <i>( )</i>
Mailing Address <i>Po Box 3066, <del>Kent</del></i>		Candidate's E-Mail Address <i>dana@danastober.com</i>
City <i>Kent</i>	County <i>King</i>	Zip + 4 <i>98089</i>
		Campaign E-Mail Address <i>info@danastober.com</i>

1. What office are you running for? <i>City Council Member</i>	Legislative District, County or City <i>City of Kent</i>	Position No. <i>3</i>	Do you now hold this office? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
2. Political party (if partisan office)	3. Date of general or special election		

4. How much do you plan to spend during your entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. If no box is checked you are obligated to use Option II, Full Reporting. See instruction manuals for information about reports required and changing reporting options.

Option I MINI REPORTING: In addition to my filing fee of \$ \_\_\_\_\_, I will raise and spend no more than \$3,500, including any charges for inclusion in state and local voters pamphlets. I will not accept more than \$300 in the aggregate from any contributor except myself.

Option II FULL REPORTING: I will use the Full Reporting system. I will file the frequent, detailed campaign reports required by law.

5. Treasurer's Name and Address. Candidate may be treasurer. List deputy treasurers on attached sheet. <input type="checkbox"/> Continued on attached sheet	Daytime Telephone Number
<i>Dana Stober 1326 E. James St. Kent, WA 98031</i>	<i>(253) 520-2469</i>

6. Committee Officers. List name, title and address. Continue on attached sheet if necessary. See reverse for definition of "officer."  Continued on attached sheet

*Bailey Stober, Campaign Manager, 1326 E. James St. Kent, WA*  
*Carol Anne Maiers, Member at large, 309 5th Ave S. Apt 319 Kent 98032*  
*Elysia Totten, Member at large, 11917 4th Ave SW. Seattle, 98146*  
*Denise Teller, Member at large, 527 3rd Ave S. Kent, WA 98032*  
*Dana Stober, Candidate, 1326 E. James St. Kent, WA 98031*

7. Campaign Bank or Depository	Branch	City
<i>U.S. Bank</i>	<i>Kent</i>	<i>Kent</i>

8. Related or Affiliated Political Committees. List name, address and relationship.

*None*

Continued on attached sheet

9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address.

Street Address, Room Number, City where campaign books will be available for inspection  
*1326 E. James St. Kent, WA 98031*

In order to make an appointment, contact the campaign at (telephone, fax, e-mail): *(253) 520-2469 or info@danastober.com*

10. CERTIFICATION:  
I certify that this report is true, complete and correct to the best of my knowledge.

Candidate's Signature: *Dana Stober* Date: *3-10-07*