## File a Formal Complaint - Glen Morgan

Glenmorgan89 reported 11 hours ago (Tue, 14 Feb at 10:32 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that Manka Dhingra -- a candidate for the 45th Legislative District Senate in the 2017 general election -- has violated numerous provisions of RCW 42.17A.

#### 1. Failure to timely file C4 expenditure reports. (Violation of RCW 42.17A.235 (1))

State law requires that candidates -- on the same day that they file their statement of organization with the PDC - must file reports containing all campaign expenditures incurred prior to that time.

The purpose of this provision in state law is to give the public timely access to information about campaign finances. This requirement serves a vital public purpose.

Dhingra filed her C1 statement of organization report on 2/13/2017. Unfortunately, she failed to file a C4 report containing all campaign expenditures made prior to that point. For example, we can see that Dhingra purchased the domain name "www.ElectManka.com" from "NameCheap Inc" on 1/9/2017. Unfortunately, this expenditure was not disclosed, which is a clear violation of state law.

The Dhingra campaign has likely made other expenditures or received contributions that have not been disclosed.

Dhingra should be required to file these important reports immediately.

#### 2. Failure to timely file C1 statement of organization report. (Violation of RCW 42.17A.205(1))

State law requires that candidates file a statement of organization (C1) with the PDC within 2 weeks of "becoming a candidate", as defined by **RCW 42.17A.005(7).** 

According to **RCW 42.17A.005(7)**, an individual becomes a candidate whenever he/she first "...receives contributions or makes expenditures or reserves space or facilities with intent to promote his or her candidacy for office."

As mentioned above, Dhingra became a candidate (per RCW 42.17A.005(7)) when she purchased the domain name www.ElectManka.com from "NameCheap Inc" on 1/9/2017. (See attachment)

To have been in compliance with state law, Dhingra would have had to have filed by 1/23/2017.

Unfortunately, Dhingra violated state law by waiting until 2/13/2017 to file her C1.

Dhingra should be sanctioned for this violation.

## 3. Failure to timely file F1 personal financial affairs statement. (Violation of RCW 42.17A.700(2))

State law requires that candidates file a statement of personal financial affairs (F1) with the PDC within 2 weeks of "becoming a candidate", as defined by **RCW 42.17A.005(7).** 

According to **RCW 42.17A.005(7)**, an individual becomes a candidate whenever he/she first "...receives contributions or makes expenditures or reserves space or facilities with intent to promote his or her candidacy for office."

As mentioned above, Dhingra became a candidate (per RCW 42.17A.005(7)) when she purchased the domain name www.ElectManka.com from "NameCheap Inc" on 1/9/2017. (See attachment)

Timely and accurately filing an F1 personal financial affairs statement with the PDC serves a vital public interest. The F1 allows the public to see the financial affairs of the candidate, as well as any potential conflicts of interests. The public has a

legal right to view this information.

Public record requests to the PDC have confirmed that Dhingra has **still** not filed her F1 with the PDC. This continued failure to file an F1 has made Manka severely late in complying with this deadline.

Manka must file her F1 personal financial affairs statement immediately so that it is available for public scrutiny.

Manka Dhingra is a longtime attorney who should be very familiar with Washington State's campaign finance law.

At this very early juncture in her campaign, Dhingra has already violated RCW 42.17A on multiple occasions.

These violations have been committed intentionally, or through the negligence of Dhingra and her officers.

There is no excuse for Dhingra to continue to remain in noncompliance with state law -- she must cure these violations immediately to whatever extent possible.

I urge the PDC to investigate these issues immediately.

Best Regards,

Glen Morgan

#### 1 Attachment

Whois electm... (319 KB)

2/14/2017 Whois electmanka.com



WHOIS

NEW

DOMAINS HOSTING

CLOUD

WEBSITES

**EMAIL** 

SECURITY

WHOIS

SUPPORT

LOGIN

0

## electmanka.com

Updated 1 second ago 🥰

#### **DOMAIN INFORMATION**

Domain: electmanka.com
Registrar: NAMECHEAP INC.

Registration Date: 2017-01-09 Expiration Date: 2018-01-09 Updated Date: 2017-02-12

Status: clientTransferProhibited

Name Servers: ns101.ehosts.com

ns102.ehosts.com

# .website

\$21.88 **\$1.48** 

**BUY NOW** 

\*Offer ends on 28th February UTC

#### REGISTRANT CONTACT

Name: WhoisGuard Protected

Organization: Whois Guard, Inc.
Street: P.O. Box 0823-03411

City: Panama
State: Panama
Country: PA

Phone: +507.8365503 Fax: +51.17057182

Email: **ffe5a3bc49544dd5b314d41bbf9fcc2a.protect**@whoisguard.com

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### **ADMINISTRATIVE CONTACT**

Name: Whois Guard Protected Organization: Whois Guard, Inc.

2/14/2017 Whois electmanka.com

Street: P.O. Box 0823-03411

City: Panama
State: Panama
Country: PA

Phone: +507.8365503 Fax: +51.17057182

Email: **ffe5a3bc49544dd5b314d41bbf9fcc2a.protect**@whoisguard.com

#### **TECHNICAL CONTACT**

Name: Whois Guard Protected

Organization: WhoisGuard, Inc.
Street: P.O. Box 0823-03411

City: Panama
State: Panama
Country: PA

Phone: +507.8365503 Fax: +51.17057182

Email: **ffe5a3bc49544dd5b314d41bbf9fcc2a.protect**@whoisguard.com

#### **RAW WHOIS DATA**

Domain name: electmanka.com

Registry Domain ID: 2088586894\_DOMAIN\_COM-VRSN Registrar WHOIS Server: whois.namecheap.com Registrar URL: http://www.namecheap.com Creation Date: 2017-01-09T01:22:35.00Z Updated Date: 2017-02-12T00:47:13.00Z

Registrar Registration Expiration Date: 2018-01-09T01:22:35.00Z

Registrar: NAMECHEAP INC Registrar IANA ID: 1068

Registrar Abuse Contact Email: abuse@namecheap.com

Registrar Abuse Contact Phone: +1.6613102107

Reseller: NAMECHEAP INC

Domain Status: clientTransferProhibited

Registrant ID:

Registrant Name: WhoisGuard Protected Registrant Organization: WhoisGuard, Inc. Registrant Street: P.O. Box 0823-03411

Registrant City: Panama

Registrant State/Province: Panama

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```
2/14/2017
   Registrant Postal Code: 0
   Registrant Country: PA
   Registrant Phone: +507.8365503
   Registrant Phone Ext:
   Registrant Fax: +51.17057182
   Registrant Fax Ext:
   Registrant Email: ffe5a3bc49544dd5b314d41bbf9fcc2a.protect@whoisguard.com
   Admin ID:
   Admin Name: WhoisGuard Protected
   Admin Organization: WhoisGuard, Inc.
   Admin Street: P.O. Box 0823-03411
   Admin City: Panama
   Admin State/Province: Panama
   Admin Postal Code: 0
   Admin Country: PA
   Admin Phone: +507.8365503
   Admin Phone Ext:
   Admin Fax: +51.17057182
   Admin Fax Ext:
   Admin Email: ffe5a3bc49544dd5b314d41bbf9fcc2a.protect@whoisguard.com
   Tech TD:
   Tech Name: WhoisGuard Protected
   Tech Organization: WhoisGuard, Inc.
   Tech Street: P.O. Box 0823-03411
   Tech City: Panama
   Tech State/Province: Panama
   Tech Postal Code: 0
   Tech Country: PA
   Tech Phone: +507.8365503
   Tech Phone Ext:
   Tech Fax: +51.17057182
   Tech Fax Ext:
   Tech Email: ffe5a3bc49544dd5b314d41bbf9fcc2a.protect@whoisguard.com
   Name Server: ns101.ehosts.com
   Name Server: ns102.ehosts.com
   DNSSEC: unsigned
   URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
   >>> Last update of WHOIS database: 2017-02-14T11:21:26.72Z <<<
```

## related domain names

namecheap.com ehosts.com icann.org whoisguard.com internic.net

2/14/2017 Whois electmanka.com

**Domains** 

Register Domain Name

**View Domain Pricing** 

**Bulk Domain Register** 

**Bulk Domain Transfer** 

Whois Lookup

Name Suggestion Tool

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Infrastructure

**Datacenter Details** 

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**Dedicated Servers** 

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Codeguard

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