

File a Formal Complaint - Glen Morgan

Glenmorgan89 reported 9 hours ago (Tue, 7 Feb at 12:23 AM) via Portal Meta

To Whom it May Concern (and that should be everyone) --

It has come to my attention that Rep. Strom Peterson has committed numerous violations of RCW 42.17A in his campaign for the State House of Representatives.

1) Failure to timely file C1. (Violation of RCW 42.17A.205 (1))

State law requires that candidates file their C1 within 2 weeks of receiving contributions or making expenditures, whichever is earliest.

Peterson began collecting contributions on 10/30/15, however he failed to file his C1 until 1/11/16, making his severely late on filing this important paperwork.

2) Illegal donation to House Democratic Campaign Committee (Violation of RCW 42.17A.430 (8))

Peterson made the following illegal donations to a political committee:

HOUSE DEMOCRATIC CAMPAIGN COMMITTEE	8/10/2016	\$15,000.00	SEATTLE WA	98194	HOUSE
DEMOCRATIC CAMPAIGN COMMITTEE					
HOUSE DEMOCRATIC CAMPAIGN COMMITTEE	12/1/2016	\$12,500.00	SEATTLE WA	98194	
CONTRIBUTION TO HDCC					

Per state law, these donations *may only come from candidate surplus fund accounts, and not directly from the candidate committee.* (see: https://www.pdc.wa.gov/sites/default/files/campaign-contribution-limits/LimitsChart_0.pdf)

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 Peterson campaign illegally failed to break down the following (19) expenses:

Vendor	Date	Amount	City
ADP PAYROLL	2016-12-01	316.19	SEATTLE
ADP PAYROLL	2016-11-17	899.74	SEATTLE
NW PASSAGE CONSULTING	2016-11-10	158.04	SEATTLE
ADP PAYROLL	2016-11-04	316.19	SEATTLE
ADP PAYROLL	2016-10-21	316.19	SEATTLE

ADP PAYROLL	2016-10-06	316.19	SEATTLE
NW PASSAGE CONSULTING	2016-10-01	1285.93	SEATTLE
ADP PAYROLL	2016-09-22	316.2	SEATTLE
ADP PAYROLL	2016-09-08	316.19	SEATTLE
ADP PAYROLL	2016-08-25	316.19	SEATTLE
ADP PAYROLL	2016-08-11	316.19	SEATTLE
ADP PAYROLL	2016-07-28	316.2	SEATTLE
NW PASSAGE CONSULTING	2016-07-26	1798.5	SEATTLE
NW PASSAGE CONSULTING	2016-07-20	86.25	SEATTLE
ADP PAYROLL	2016-07-14	316.19	SEATTLE
ADP PAYROLL	2016-06-30	317.46	SEATTLE
ADP PAYROLL	2016-06-17	317.46	SEATTLE
ADP PAYROLL	2016-06-02	317.47	SEATTLE
ADP PAYROLL	2016-05-19	610.94	SEATTLE

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

Peterson failed to report expenditures/in-kind contribution for professional photography. You can find examples of this professional photography on his website: <http://votestrom.com/> . (See image slider)

It is likely that these professional images were also used on his campaign mailers during the 2016 cycle as well. The source (and value) of these pieces of professional photography must be reported.

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

In his campaign, Peterson sent out two mailers to registered voters within the 21st Legislative District.

He used mailing lists to target specific voters in an effort to win the maximum number of voters per dollar spent.

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

Unfortunately, because Peterson failed to report the expenditure for said mailing lists, or the in-kind contribution of mailing lists from some outside entity, he is in violation of **RCW 42.17A.235**. Peterson must amend his reports to include the source of his mailing lists, either as an in-kind contribution to his campaign or as an expenditure.

6) 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.

The Peterson campaign failed to illegally report the following debts on preceding C4s:

Vendor	Date	Amount	City
ADP PAYROLL	2016-05-19	610.94	SEATTLE
ADP TAXES	2016-05-19	241.44	SEATTLE
ADP INVOICES	2016-05-27	89.13	SEATTLE
ADP PAYROLL	2016-06-02	317.47	SEATTLE
ADP TAXES	2016-06-02	108.72	SEATTLE
ADP TAXES	2016-06-10	108.73	SEATTLE
ADP INVOICES	2016-06-10	64.13	SEATTLE
ADP PAYROLL	2016-06-17	317.46	SEATTLE
ADP INVOICES	2016-06-24	64.13	SEATTLE

ADP PAYROLL	2016-06-30	317.46	SEATTLE
ADP TAXES	2016-06-30	92.87	SEATTLE
CHEESEMONGER'S TABLE CATERING	2016-07-01	250	EDMONDS
NW PASSAGE CONSULTING	2016-07-08	1500	SEATTLE
ADP INVOICES	2016-07-08	64.13	SEATTLE
ADP PAYROLL	2016-07-14	316.19	SEATTLE
ADP TAXES	2016-07-14	96.36	SEATTLE
ADP INVOICES	2016-07-22	64.13	SEATTLE
NW PASSAGE CONSULTING	2016-07-26	1798.5	SEATTLE
PUBLISHERS MAILING SERVICE	2016-07-27	1759.04	SEATTLE
ADP PAYROLL	2016-07-28	316.2	SEATTLE
ADP TAXES	2016-07-28	96.35	SEATTLE
ADP INVOICES	2016-08-05	64.13	SEATTLE
ADP PAYROLL	2016-08-11	316.19	SEATTLE
ADP TAXES	2016-08-11	96.36	SEATTLE
ADP INVOICES	2016-08-19	74.13	SEATTLE
ADP PAYROLL	2016-08-25	316.19	SEATTLE
ADP TAXES	2016-08-25	96.36	SEATTLE
ADP INVOICES	2016-09-02	64.13	SEATTLE
ADP PAYROLL	2016-09-08	316.19	SEATTLE
ADP TAXES	2016-09-08	96.36	SEATTLE

ADP INVOICES	2016-09-16	64.13	SEATTLE
ADP PAYROLL	2016-09-22	316.2	SEATTLE
ADP TAXES	2016-09-22	96.35	SEATTLE
ADP INVOICES	2016-09-30	64.13	SEATTLE
NW PASSAGE CONSULTING	2016-10-01	1285.93	SEATTLE
ADP PAYROLL	2016-10-06	316.19	SEATTLE
ADP TAXES	2016-10-06	96.36	SEATTLE
ADP INVOICES	2016-10-17	64.13	SEATTLE
ADP PAYROLL	2016-10-21	316.19	SEATTLE
ADP TAXES	2016-10-21	96.36	SEATTLE
ADP INVOICES	2016-10-28	74.13	SEATTLE
ADP PAYROLL	2016-11-04	316.19	SEATTLE
ADP TAXES	2016-11-04	96.36	SEATTLE
NW PASSAGE CONSULTING	2016-11-10	158.04	SEATTLE
NW PASSAGE CONSULTING	2016-11-11	271.5	SEATTLE
ADP INVOICES	2016-11-14	64.13	SEATTLE
ADP PAYROLL	2016-11-17	899.74	SEATTLE
ADP TAXES	2016-11-17	333.45	SEATTLE
ADP INVOICES	2016-11-25	64.13	SEATTLE
ADP PAYROLL	2016-12-01	316.19	SEATTLE
ADP TAXES	2016-12-01	96.36	SEATTLE

7) Failure to accurately file contribution reports (C3s) and expenditure reports (C4s) by deadline. (Violation of RCW 42.17A.235)

a) According to the PDC, the accurate report of expenditures (C4) for the time period of 9/01/2016 to 10/17/2016 was due on 10/18/2016.

Unfortunately, Peterson's campaign failed to file an accurate report containing all expenditures. Namely, Peterson's original C4 for this time period (Ref. # 100728202) failed to report an in-kind contribution of "office rent" valued at \$600 from the "Harry Truman Fund".

Peterson's campaign failed to file an accurate report until 10/24/2016, when they submitted an amended C4 that included this in-kind contribution. This is well past the statutory deadline.

b) According to the PDC, the accurate report of expenditures (C4) for the time period of 10/18/2016 to 10/31/2016 was due on 11/1/2016.

Unfortunately, Peterson's campaign failed to file this report until 11/2/2016, which is past the statutory deadline.

c) According to the PDC, the accurate report of expenditures (C4) for the time period of 12/01/2016 to 12/31/2016 was due on 1/10/2017, however, it was not filed until 1/12/2017, well past the statutory deadline.

d) According to the PDC, the accurate report of contributions (C3) for the time period of 10/24/2016 to 10/31/2016 was due on 11/1/2016, however, it was not filed until 11/2/2016, well past the statutory deadline.

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

The committee failed to report last minute contributions (@ aggregate of \$1000 or higher) from the following groups within the 48 hour time limit on an LMC form, as required by law:

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

Pacific NW Regional Council of Carpenters
WA Medical Political Action
Washington Council of Firemen

9) Failure to list Northwest Passage Consulting as a committee officer. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.

Peterson's campaign failed to list Northwest Passage Consulting as an officer, which is required by **RCW 42.17A.205(2)(c)**. NWP Consulting was the consultant and lead for the campaign.

I believe that NWP Consulting should have been listed as a committee officer, because NWP Consulting, 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 note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

10) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1 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..."

Despite doing most of the ordering for mail projects for the Peterson campaign, NWP Consulting did not appear as an officer on Peterson's C1 form.

I believe that Northwest Passage Consulting illegally made expenditures for the Peterson campaign, in violation of state law.

11) Potential illegal use of campaign funds for personal purposes. (Violation of RCW 42.17A.445)

Peterson made the following expenditure to his own personal business for a "campaign kickoff":

CHEESEMONGER'S TABLE CATERING 2016-07-01 250 EDMONDS WA 98020 CAMPAIGN KICK-OFF

I believe that Peterson used his campaign funds to personally benefit the business that he owned (Cheesemonger's). (See attached F1)

The PDC should investigate to determine if his campaign actually received \$250 of market-value goods/services.

12) Failure to acknowledge understanding of RCW 42.52.180. (Violation of RCW 42.17A.700 (7))

State law requires that incumbents for public office check a box on their F1 acknowledging applicable statutes prohibiting misuse of public money for campaign purposes.

Peterson failed to do this on his 2016 F1.

I request that the PDC investigate these claims immediately.

Best Regards,

Glen Morgan

1 Attachment

PDF [PetersonStro...](#)
(1.01 MB)