

Complaint Description

File a Formal Complaint - Christopher Stearns

[Christopher Stearns](#) reported (Tue, 23 Oct at 7:12 AM) via Portal Meta

A fraudulent election campaign flyer was delivered to my mailbox. It attempted to steal my vote by asking me to vote for a person (EJ Zita) who is not registered in the campaign for Thurston County Commissioner District #3 (and not vote for the Democratic Candidate, Tye Menser). If I did, my vote would not count.

This is a violation of RCW 42.17A.335 The person listed as Executive Director is Glen Morgan a member of the Thurston County Republican Central Committee (R-PCO). He also appears as one of seven Board members for the Thurston Farm Bureau which is one of the 25 active chapters of the Washington Farm Bureau who's PAC has endorsed for this race "Bud Blake" who is the candidate who stands to gain from the deceit of this mailing being the other candidate that is on the ballot.

The major contributor to A Brighter Thurston County is the Thurston County

Republican Party. I would be glad to turn over the mailing for the PDC to copy later today. There have been two recent articles in both the Daily Olympian and the Seattle Times on this specific type of action also against other Democrats elsewhere in our state running for seats in the legislature. This is not a one off, but rather a coordinated strategy that is being carried out across our state.

I am also concerned that Glen Morgan who calls himself a citizen's lobbyist and is often seen testifying at the legislature may be in violation of the PDC rules regarding both not registering as a lobbyist and not reporting his compensation or expenditures on entertainment or campaigning for either Republican, Non-Partisan or Independent Candidates for the Legislature and in Local Government. As an elected official myself, who must obey the regulations of your disclosure reports, I find that your lack of enforcement of the laws of public disclosure in this state on this individual who has successfully used your state agency repeatedly to pursue a lopsided partisan agenda (quite legally) through your own enforcement actions. Time to show that everybody is "equal under the law" and that penalties will be commensurate, not just a slap of the unregistered lobbyist's hand, with the seriousness of the offense of tampering with our electoral system of which

we have seen a great deal of by the federal branch of the Republican Party for at least the last three years! Chris Stearns

[Christopher Stearns](#) replied (Tue, 23 Oct at 9:28 AM)

to : pdc@pdc.wa.gov

I and many other targeted democrats have filed a fraud complaint with the Thurston County Sheriff's office and a mail fraud complaint with the US Postal Service against Glen Morgan. I can come down to the office to allow you to copy the flyer that we all received. Chris Stearns Thurston PUD Commiissioner Dist. #3.

[Christopher Stearns](#) replied (Wed, 24 Oct at 2:40 PM)

to : pdc@pdc.wa.gov

RCW 42.17A.335 Political advertising or electioneering communication - Libel or defamation per se

[RCW 42.17A.335](#)

Political advertising or electioneering communication—Libel or defamation per se.

(1) It is a violation of this chapter for a person to sponsor with actual malice a statement constituting libel or defamation per se under the following circumstances:

(a) Political advertising or an electioneering communication that contains a false statement of material fact about a candidate for public office;

(b) Political advertising or an electioneering communication that falsely represents that a candidate is the incumbent for the office sought when in fact the candidate is not the incumbent;

(c) Political advertising or an electioneering communication that makes either directly or indirectly, a false claim stating or implying the support or endorsement of any person or organization when in fact the candidate does not have such support or endorsement.

(2) For the purposes of this section, "libel or defamation per se" means statements that tend (a) to expose a living person to hatred, contempt, ridicule, or obloquy, or to deprive him or her of the benefit of public confidence or social intercourse, or to injure him or her in his or her business or occupation, or (b) to injure any person, corporation, or association in his, her, or its business or occupation.

(3) It is not a violation of this section for a candidate or his or her agent to make statements described in subsection (1)(a) or (b) of this section about the candidate himself or herself because a person cannot defame himself or herself. It is not a violation of this section for a person or organization referenced in subsection (1)(c) of this section to make a statement about that person or organization because such persons and organizations cannot defame themselves.

(4) Any violation of this section shall be proven by clear and convincing evidence. If a violation is proven, damages are presumed and do not need to be proven.

**I have also found RCW on elections and fraud:
RCW 29A.84.620 and
RCW 29A.84.630**

**RCW 9A.60.010
RCW 9A.60.020
RCW 9A.60.040**

The statement of "for any unlawful purpose" would be found in the last statute RCW 9A.60.040 both in: subsection (1) (a) and (1) (b). In this case that would refer to the unlawful purposes in two statutes on elections:

**RCW 29A.84.620 and
RCW 29A.84.630**

I have filed a fraud complaint with the Thurston County Sheriff's Dept. #T18001171 based on the above statutes. Also since this flyer arrived by the US mail, I have engaged a complaint for electioneering mail fraud (not involving the loss of money) and the USPS is looking into the improper use of a bulk mailing permit which could violate federal laws. So far, mailings have gone out targeting democratic voters in the Thurston County Commissioner District #3 race and Democratic voters identified in the Legislative Districts 6, 9 and 16 which are all in other counties. The exact same mail electioneering fraud occurred there using different write-in people and PAC's that also pretends to be "Progressive". Chris Stearns

That is the statutes that the distribution of this flyer violated that falls in your domain.

What impact does the alleged violation(s) have on the public?

Glen Morgan has committed voter fraud through the mail, which is Mail Fraud as well.(USPS federal law) Complaints are also being filed at the Thurston County Sheriff's Office for Fraud as the offense occurred in this jurisdiction. He is engaged in making false and misleading flyers targeting mostly Democratic voters to write-in a candidate, in this case EJ Zita, my fellow elected Olympia Port Commissioner,(without her permission or prior knowledge of this mailing, she has no intent to be a candidate in this race) to run as a write-in candidate who is not registered as a candidate for this Thurston County Commissioner District #3 effectively trying to throw away (steal) my vote for this elective office in this current general election.

List of attached evidence or contact information where evidence may be found.

I will allow the PDC to copy the flyer in their office today!

List of potential witnesses with contact information to reach them.

The Thurston County Democratic Central Committee which discussed this attack last night at their regular meeting for the month of October.

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.