

Complaint Description

File a Formal Complaint - Glen Morgan

Glen Morgan (Mon, 29 Oct 2018 at 10:40 PM)

To Whom it May Concern --

It has come to my attention that the Spokane County Democratic Central Committee (hereafter collectively referred to as "respondent") has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

It should be noted that this organization is currently in litigation with the Attorney General's office (See **Thurston County District Court #17-2-02837-34**). It is possible that some of the late reports detailed below are a result of this organization attempting to report the missing and unreported documents which are material to that litigation. However, many of the reports documented below are new violations committed and were not included in the original complaint which helped initiate the AG lawsuit.

1) Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (**WAC 390**). State law also requires that contributions must be deposited within 5 business days of receipt. Unfortunately, the respondent has failed on numerous occasions to do this, including, but not limited to the late reports detailed in the attached exhibit. Additionally, the respondent has failed to report debt and properly break down/detail expenditures.

(Please See **Exhibit A: "Illegally late reported C3 & C4 reports"**)

Please note, this organization's extremely late filings are a total of **at least 17,554 days late**. Again, as referenced above, these are merely the violations committed after the previous complaint had been filed, and while it is possible some of these late reports are due to attempts at compliance by this organization, some of these are certainly newer violations. This lack of timely reporting denied the public or the media any access to the truth about the funding or spending for this large political organization many times during recent elections.

The PDC should investigate the possibility that the respondent committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please don't hesitate to contact me if you need any additional information.

Please note the attached exhibit is provided in two different file formats for staff convenience.

Best Regards,

Glen Morgan

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

The public has a right to know who funding organizations like this is and how they spend their political dollars. This organization has failed to provide this information to the public in a timely manner on a historic and impressive scale over recent years, thereby depriving the public of its right to know. Despite being in active litigation with the AG, this pattern of behaviour continues.

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

Attached spreadsheets are provided in multiple file formats for staff convenience. Organized by date. PDC tracking numbers for each report are listed.

List of potential witnesses with contact information to reach them.

The treasurer and officers who are not named in the current AG lawsuit.

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.