

Complaint Description

File a Formal Complaint - Glen Morgan

Glen Morgan (Mon, 29 Oct 2018 at 10:58 PM)

To Whom it May Concern --

It has come to my attention that candidate Shir Regev, candidate for the Legislature in the 8th LD (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.

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, repetitive late filings are a total of **at least 1,228 days late**. These are all detailed in the referenced report. 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 political candidates like this is and how they spend their political dollars. This candidate has failed to provide their information to the public in a timely manner, thereby depriving the public of its right to know.

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 candidate and the treasurer are probably both worth speaking to in this case

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.