

Complaint Description

File a Formal Complaint - Glen Morgan

Glen Morgan (Mon, 29 Oct 2018 at 11:18 PM)

To Whom it May Concern --

It has come to my attention that the Yes Libraries Pierce PAC(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 539 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.

2) Illegal use of public resources (Violation of RCW 42.17A.555)

According to the C3s filed by this PAC, they have received \$40,000 in two transactions of \$20,000 each from "Pierce County Library System" which also references the same address as the Pierce County Library system, which is a public entity. (See **PDC Tracking # 100853874 & # 100846079**) It is illegal to use taxpayer funded public resources to fund a Political Action Committee.

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 if illegal use of \$40k in tax payer dollars were used to fund a political action committee. in addition, the public has a right to know who is funding and how they are spending these political funds, which can only be done with timely reporting - something this PAC failed to achieve.

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

Two spreadsheets are attached in multiple file formats for staff convenience.

List of potential witnesses with contact information to reach them.

The officers and treasurer are a good start. It might be necessary to also figure out who approved the illegal \$40k contribution from the Pierce County Library System.

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.