

## Complaint Description

### File a Formal Complaint - Glen Morgan

Glen Morgan (Mon, 29 Oct 2018 at 11:36 PM)

To Whom it May Concern --

It has come to my attention that the 45<sup>th</sup> Legislative District Democrats (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.

Please note, the PDC is still investigating this organization under a previous complaint filed against this organization (See **PDC Investigation #16743**). Please note the violations detailed in this complaint are the violations committed by this organization AFTER the violations identified in the original complaint. Please note, this organization has already admitted to violations in their original response to the original complaint, yet these violations continue despite being currently under investigation by the PDC.

#### **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 1,443 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 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, thereby depriving the public of its right to know. It continues to do this despite the fact it is still under investigation by the PDC of previously admitted violations

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

The spreadsheets attached provided in two file formats for staff convenience should provide adequate detail to review the merits of this complaint

**List of potential witnesses with contact information to reach them.**

The officers and the treasurer are worth contacting

**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.