

Complaint Description

File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Tue, 23 Oct at 10:39 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the Service Employees International Union Political Education & Action Fund 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, this secretive PAC’s extremely late filings are a total of **at least 26,348 days late** and involve **large sums of hidden cash** which was kept from the public **during the critical 30 day window** of a variety of election dates, and in many cases these reports were **submitted years after the elections were long past**. This denied the public or the media any access to the truth about the funding or spending for this well-funded PAC

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 PDC staff convenience.

Best Regards,

Glen Morgan
2 Attachments

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

Large sums of money were kept hidden from the public during critical elections over many years in a systematic way to hide the extensive financial involvement of this organization. The public (and the media) had a right to know about these funds and how they were spent, yet this information was hidden from the public.

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

A spreadsheet of late reports - including total days late, Report numbers (for ease of verification).

It is likely worthwhile to review the respondent's bank account to ensure that these reports actually match the amounts explained.

List of potential witnesses with contact information to reach them.

The officers and treasurer(s) of this PAC should be contacted

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.