

Complaint Description

File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Tue, 23 Oct at 11:20 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the Pierce 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.

Please note, these violations are particularly troubling because the Pierce County Democratic Central Committee recently settled a lawsuit in a civil action brought by the Washington State Attorney General against the Pierce County Democrats last year (see settlement – **Thurston County Court Case # 17-2-04616-34 attached dated October 27, 2017**). The Pierce County Democrats are still in the critical probationary four year period covered by that settlement (see part 2a,b of the attached settlement agreement) and have clearly violated the terms of that settlement by failing to file timely C3 and C4 reports. According to the terms of this settlement, if the PDC confirms these violations to be accurate, then **the Pierce County Democratic Central Committee will have 30 days to pay the suspended portion of the settlement fine which is \$15, 890.**

The most recent violations (post-settlement) are as follows:

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”**)

Additionally, it is worth noting that the former Public Disclosure Commission Executive Director Evelyn Lopez was the attorney of record in the above noted settlement. She was substantially late in reporting her in-kind legal fees to this committee, but I chose not to detail that specific violation of the statute because under the changes made to RCW 42.17A this past June, this specific violation would qualify, in my opinion, as a relatively insignificant violation of the statute. However, there is no real excuse for so many late reports which have yet to be addressed by the PDC.

However, there is no good reason for this committee to be at least 8,742 days late on their other reports post settlement.

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

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

The Pierce County Democratic Central Committee is a serial violator of Washington State's campaign finance laws, with a recent lawsuit filed by the Washington State Attorney General's office to prove this fact, and a generous settlement finalized October 27, 2017. However less than a year after that settlement and generous payment plan was arranged by the former Director of the PDC herself representing the Pierce County Democrats, they still chose to

violate not just the state's campaign finance laws but also the terms of the settlement itself. The public has a right to know what this organization is actually doing with the money they receive and who is funding this organization – a right that is severely harmed by the actions of this committee.

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). A copy of the settlement is also included.

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.