

## Complaint Description

### File a Formal Complaint - Glen Morgan

Glen Morgan reported (Mon, 29 Oct at 4:08 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the United Food and Commercial Workers – Local 21 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 4,189 days late and involve large sums of hidden cash which was kept from the public during the critical 30 day window through a variety of elections over the past few years, 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, very sophisticated big-money 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 staff convenience.

Best Regards,

Glen Morgan

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

It is important for the public to know the large dollar donations that are made by sophisticated PACs like this one, and the failure to properly report these large sums of money to the public is a serious violation of Washington State's campaign finance laws - in some cases these are major donations reported years after the fact.

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

A spreadsheet in two different file formats is attached for staff convenience. Please note that the PDC tracking # is referenced for each report

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

The officers and the treasurer are logical contacts

**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.

## Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- **4189**

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	vs Late Dep	Due Date	Date Submitted	Approximate Days Late
1	100854122	C3	N	10/13/2017	0	10/16/2017	8/24/2018	312
2	100854114	C3	N	6/22/2017	0	6/26/2017	8/24/2018	424
3	100854118	C3	N	8/17/2017	0	8/21/2017	8/24/2018	368
4	100854124	C3	N	10/27/2017	0	10/30/2017	8/24/2018	298
5	100854109	C3	N	3/24/2017	0	4/10/2017	8/24/2018	501
6	100854128	C3	N	12/18/2017	0	1/10/2018	8/24/2018	226
7	100854116	C3	N	7/17/2017	0	7/24/2017	8/24/2018	396
8	100854119	C3	N	9/21/2017	0	9/25/2017	8/24/2018	333
9	100854112	C3	N	5/3/2017	0	6/12/2017	8/24/2018	438
10	100845589	C3	Y	5/2/2018	0	6/11/2018	7/17/2018	36
11	100749412	C4	N			12/12/2016	2/22/2017	72
12	100749414	C4	N			1/10/2017	2/22/2017	43
13	100733282	C4	N			11/1/2016	11/2/2016	1
14	100722052	C4	Y			9/12/2016	9/20/2016	8
15	100721101	C4	N			9/12/2016	9/14/2016	2
16	100715052	C3	N	8/5/2016	0	8/8/2016	8/9/2016	1
17	100712065	C4	N			7/26/2016	7/28/2016	2
18	100708499	C4	N			7/12/2016	7/14/2016	2
19	100678878	C4	N			2/10/2016	2/15/2016	5
20	100675617	C4	Y			10/13/2015	1/15/2016	94
21	100675618	C4	Y			12/10/2015	1/15/2016	36
22	100675619	C4	Y			1/11/2016	1/15/2016	4
23	100672297	C4	N			12/10/2015	12/15/2015	5
24	100659180	C3	Y	2/20/2015	0	3/10/2015	10/2/2015	206
25	100659178	C3	N	2/13/2015	0	3/10/2015	10/2/2015	206
26	100659181	C3	Y	4/22/2015	0	5/11/2015	10/2/2015	144
27	100659179	C3	N	9/25/2015	0	9/28/2015	10/2/2015	4
28	100657371	C4	Y			9/10/2015	9/17/2015	7
29	100657369	C4	Y			9/10/2015	9/17/2015	7
30	100656855	C4	N			9/10/2015	9/14/2015	4
31	100643233	C4	N			6/10/2015	6/11/2015	1
32	100630389	C4	N			3/10/2015	3/13/2015	3

						<b>Total Days Late</b>	<b>4189</b>
--	--	--	--	--	--	------------------------	-------------