

## Complaint Description

[Glen Morgan](#) (Fri, 27 Jul at 1:00 AM)

To Whom it May Concern --

It has come to my attention that Jedidiah "Jed" Haney running for Thurston County Commissioner, Position 3, and acting as his own treasurer (according to his C1) 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 C4 reports. (Violation of RCW 42.17A.235)**

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**).

Unfortunately, the Haney campaign **has failed to file ANY C-4 reports** detailing campaign expenditures.

At a minimum, the candidate has failed to report the following expenditures:

- 1. Filing fee** – a \$1,178.28 filing fee is required for this position, and Mr. Haney wouldn't be able to run for office without paying this fee.
- 2. Campaign Signs** – the candidate's campaign has been placing signs all over Thurston County for many months. A photograph of some of these signs is attached. The candidate needs to report the true costs, vendor, and quantity he purchased.
- 3. Campaign T-Shirts** – the candidate has purchased some campaign T-shirts which he has worn at various campaign functions, the cost, the quantity and identify the vendor (see attached photo of the candidate for evidence of this expenditure at the June Swede Days Parade)
- 4. Campaign Buttons** – the candidate has purchased and distributed campaign buttons, and they also need to be reported as such on a C4 – quantity, vendor, etc. (see photo of candidate at Swede Days Parade for proof).
- 5. Parade entry fees** – the candidate has paid entry fees for various parades throughout Thurston County. For example, the entry fee for the Swede Day Parade is \$12, the Pride Parade in Olympia is \$50, the Tenino Prairie Days Parade is \$60, etc. This candidate was in multiple parades and any expenditures related to these parade events – including balloons, signage, entry fees should be reported, but they have not. Photo of candidate vehicle at the Swede Days Parade is provided as further evidence.
- 6. Brochures and handouts** – This candidate has produced some brochures and literature. Nothing has been reported.
- 7. Website and website development** – This candidate has a campaign website. See <https://voteforjed.com/>. The expense of reserving the URL, hosting the site, developing the website, paying for the on-line contribution vendor – none of these costs are reported.
- 8. Professional Photography** – This is another campaign expenditure not reported by this campaign, and it appears that some professional photos for the website and campaign were produced for this campaign.
- 9. Facebook boosted posts** – This campaign has a dedicated Facebook page, and they may have boosted campaign posts and information as ads on Facebook, which would also need to be reported with adequate detail.
- 10. Tumwater Credit Union banking costs** – the Tumwater Credit Union charges fees related to new bank accounts, and this information would need to be reported as an expenditure as well.

There are likely additional expenditures which have not been detailed here which will also need to be reported to the PDC.

**1) Failure to file accurate, timely C3 reports. (Violation of RCW 42.17A.235)**

When adding up the likely costs defined above, it appears that the Haney campaign has spent more money on this campaign than has been reported in either contributions or loans to the campaign. This means that the current C3 reports (as limited as they may be) are clearly deficient in not accurately reporting the amount of money donated (and from whom) or loaned or provided in-kind to this campaign.

The PDC should investigate the possibility that the respondent committed the above violations in an effort to be malicious or willfully hide the truth from the public, 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 see the attached photographs as supporting evidence.

Best Regards,

Glen Morgan

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

The public has a right to know how candidates are spending their campaign funds and who is funding their campaign. In this case, exactly zero information is being provided for the public to know how this candidate is spending their campaign money. Additionally, the public can't know who is funding this campaign because the disclosure rules are not being accurately followed reporting who is funding this campaign either. It is not common for a candidate running for such a significant position in county government to just completely ignore nearly all the campaign finance reporting requirements.

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

Link to candidate website is provided within the body of the complaint. Multiple photos of candidate at a parade are provided merely to provide evidence of some of the missing expenditures hidden from the public.

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

The candidate and his listed officer is worth contacting. The candidate has identified himself as the treasurer, so probably most of the necessary information could be obtained first by contacting the candidate.

**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.