

File a Formal Complaint - Glen Morgan

Glen Morgan reported (Thu, 19 Apr at 3:49 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that Teresa Purcell, People for Purcell, its treasurer, its officers, and any parent or subsidiary organization associated with it (hereafter collectively referred to as "respondent") have 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. (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 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 debts & liabilities and properly break down/detail expenditures.

Please see attached **Exhibit A – "Illegally late reported C3 and C4 reports"**

Please note that all of these reports disclose contributions **that should have been disclosed prior to the 2016 elections. They are only being reported now.**

These reports include large contributions from wealthy Seattle environmental extremist Peter Goldman, Representative Eric Pettigrew and various other out-of-district dark money donors that would have been very impactful for voters in the 19th Legislative District to have known at the time of the 2016 election. It appears that Purcell intentionally failed to disclose these contributions in an effort to disguise and obscure the true funding sources for her political campaign and to keep these sources secret from the public.

It should be particularly notable that these violations are continuing to occur despite the fact the Washington State Attorney General is in active litigation against Purcell for a historic pattern of failing to comply with this statute (See **Thurston County Superior Court #16-2-04959-34**). Please note that this litigation has been amended on multiple occasions to include additional violations discovered and committed by Purcell over the past 15 months (most of which I have provided to the AG's office during this time).

There appears to be a pattern of treating Washington State's fair campaign practices act (**RCW 41.17A**) as an afterthought by Purcell regardless of the attention, litigation, and potential penalties that may be accruing. At this point, it is demonstrably evident that no member of the public can be confident with any degree of accuracy in either the historic or current reports filed by the respondent with the PDC. This serves neither the objective of the statute or the over-arching goals of transparency in the political process today. It is difficult to imagine any mitigating factors that can continue to explain the repeated serial violations of the statute by this respondent. Conceivably, only serious intervention by both the Public Disclosure

Commission and the Washington State's Attorney General's office has the potential to rectify this situation.

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, I have provided the attached spreadsheet in multiple file formats for staff convenience.

Best Regards,

Glen Morgan
2 Attachments