

File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Wed, 11 Apr at 1:46 AM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that Alishia Topper a candidate for the Clark County Council & Elect Alishia Topper (PAC), 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, 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”**)

2) Failure to report last minute contributions. (Violation of RCW 42.17A.265)

On information and belief, respondent has failed to properly report last minute cash or in-kind contributions of \$1000 or more.

3) Failure to list committee officers, timely file/update C-1/C-1PC. (Violation of RCW 42.17A.205, see WAC 390-05-245)

On information and belief, respondent failed to list all committee officers on form C-1/C1-pc, which is required by **RCW 42.17A.205(2)(c)**. I believe they also failed to timely file/update form C-1/C-1PC to include relevant material changes in information as required by state law.

The committee is required to list all individuals who, in conjunction with others, likely made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

State law requires that candidates/committees file their C1/C1-pc statement of organization within 2 weeks of accepting contributions or making expenditures, whichever is sooner.

On information and belief, the respondent has failed to abide by this requirement.

4) Illegal unauthorized expenditure of funds by an individual not listed as an officer on form C-1/C1-pc. (Violation of RCW 42.17A.425)

State law requires that no expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form.

On information and belief, respondent failed to abide by this requirement.

5) Failure to preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred. (Violation of RCW 42.17A.235 (6)).

On information and belief, the respondent has failed to abide by this requirement.

6) Illegal depositing of campaign funds into bank account by person other than the treasurer or deputy treasurer. (Violation of RCW 42.17A.220 (1))

On information and belief, the respondent has failed to abide by this requirement.

7) Failure to include sponsor ID. (Violation of RCW 42.17A.320)

State law requires that all political advertisement/independent expenditures contain sponsor identification, which includes the sponsor's name and address as well as other donor information. Mediums defined as political advertisement that are required to contain sponsor ID include Facebook pages and advertisements per **WAC 390-05-290**.

On information and belief, the respondent has failed to abide by this requirement.

8) Failure to timely file form C6 reporting independent expenditure. (Violation of RCW 42.17A.255(2))

State law requires that independent expenditures must be reported to the PDC in a timely fashion. The form for disclosing independent expenditures is identified as form C6 according to the PDC.

On information and belief, the respondent has failed to abide by this requirement.

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