

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Fri, 13 Oct at 12:35 AM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that the 47th District Democrats have habitually and willfully committed frequent and multiple violations of **RCW 42.17A**.

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, and debt. Unfortunately, the 47th District Democrats has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

2) Failure to accurately, timely report debt. (Violation of RCW 42.17A.240 (8), see WAC 390-05-295)

State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days be reported on form C4. Per **WAC 390-05-295**, this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service.

The 47th District Democrats illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

3) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)

State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with **WAC 390-**

16-037 and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4.

The 47th District Democrats illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that the 47th District Democrats 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.

Best Regards,

Glen Morgan

Exhibit C -- Illegal Failure to breakdown expenditures.

Cumulative Days Late --		798		As of --		10/12/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	THORNE KAREN	4/30/2017	\$ 76.25	COMM OUTREACH M/	Failure to identify subvendor,	100757909	155
2	STOBER BAILEY	4/17/2016	\$ 259.55	COSTCO, KRISPY, WAL	Failure to breakdown expenditure per source, failure to describe expenditure.	100696388	519
3	KESTERSON BRYAN	4/20/2016	\$ 285.89	CAUCUS PRINTING	Failure to identify subvendor, failure to identify number of items printed.	100696388	519
4	BOLTON JEAN	4/20/2016	\$ 399.32	PRINTING, 2 CHAIR DE	Failure to identify subvendor, failure to identify number of items printed.	100696388	519
5	BOLTON JEAN	5/10/2017	\$ 81.40	GIFT FOR PAT S.	Failure to identify subvendor,	100766624	124
Total			\$ 1,102.41				

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		2068		As of -- 10/12/2017			Approx. days late
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.		
1	TRADE PRINTERY	4/30/2017	\$ 418.38	2000 REMIT ENVELOPES	This should have been reported as debt on the C4 covering the time period of March 2017.		185
2	KCDCC	4/30/2017	\$ 500.00	47TH LD DUES TO KCDCC	This should have been reported as debt on the C4 covering the time period of March 2017.		185
3	ALEXANDER PARTY RENTAL	3/10/2016	\$ 586.99	CHAIRS ETC FOR CAUCUS	This should have been reported as debt on the C4 covering the time period of February 2016.		581
4	BOLTON JEAN	4/20/2016	\$ 399.32	PRINTING, 2 CHAIR DEPOSIT, COSTCO, SAFEWAY	This should have been reported as debt on the C4 covering the time period of March 2016.		549
5	STOBER BAILEY	4/17/2016	\$ 259.55	COSTCO, KRISPY, WALGREENS	This should have been reported as debt on the C4 covering the time period of March 2016.		549
6	KESTERSON BRYAN	4/20/2016	\$ 285.89	CAUCUS PRINTING	This should have been reported as debt on the C4 covering the time period of March 2016.		549
7	KENT SCHOOL DISTRICT	4/2/2016	\$ 362.31	PHX ACADEMY RENT 3/26	This should have been reported as debt on the C4 covering the time period of March 2016.		549
8	KENT SCHOOL DISTRICT	5/4/2016	\$ 796.94	PHX ACADEMY	This should have been reported as debt on the C4 covering the time period of April 2016.		519
9	KCDCC	5/17/2017	\$ 1,000.00	FOR SKC	This should have been reported as debt on the C4 covering the time period of April 2017.		155
10	PAGE TYLER	7/26/2017	\$ 310.00	KENT CORN DAYS BOOTH	This should have been reported as debt on the 7-day pre-primary C4.		79
			Total	\$ 4,919.38			

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 79

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100715363	C4	N		7/26/2016	8/10/2016	15
2	100696388	C4	N		5/10/2016	5/24/2016	14
3	100776401	C4	N		7/11/2017	7/21/2017	10
4	100738909	C4	N		12/12/2016	12/21/2016	9
5	100702687	C4	N		6/10/2016	6/18/2016	8
6	100672403	C4	N		12/10/2015	12/17/2015	7
7	100734767	C4	N		11/1/2016	11/8/2016	7
8	100721416	C4	N		9/12/2016	9/17/2016	5
9	100729054	C4	N		10/18/2016	10/20/2016	2
10	100708358	C4	N		7/12/2016	7/13/2016	1
11	100778814	C4	N		7/25/2017	7/26/2017	1