

# File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Thu, 2 Nov at 12:33 AM) via Portal Meta  
To Whom it May Concern --

It has come to my attention that Rep. Ruth Kagi 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. (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, Rep. Ruth Kagi 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.

Rep. Ruth Kagi 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.

Rep. Ruth Kagi illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that Rep. Ruth Kagi 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 all three attachments in both Excel and PDF file formats as requested by PDC staff

Best Regards,

Glen Morgan

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

Approximate Cumulative Days Late -- 100

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100692294	C4	N		2/10/2016	5/2/2016	82
2	100738742	C4	N		12/12/2016	12/18/2016	6
3	100675646	C4	N		1/11/2016	1/16/2016	5
4	100702505	C3	N	6/11/2016	6/13/2016	6/16/2016	3
5	100714123	C3	Y	7/28/2016	8/1/2016	8/3/2016	2
6	100728580	C4	N		10/18/2016	10/19/2016	1
7	100733303	C4	N		11/1/2016	11/2/2016	1

## Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		3661		As of -- 11/1/2017		
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
				INVITATIONS AND REMIT ENVELOPS FOR CAMPAIGN		
1	OVERNIGHT PRINTING	4/13/2016	\$ 489.40	KICKOFF	This should have been reported as debt on the C4 covering the time period of March 2016.	569
2	SHORELINE SCHOOL DISTRICT	4/28/2016	\$ 294.20	ROOM RENTAL FOR CAMPAIGN KICKOFF	This should have been reported as debt on the C4 covering the time period of March 2016.	569
3	NWP CONSULTING	5/10/2016	\$ 1,500.00	RETAINER FOR CAMPAIGN CONSULTANT	This should have been reported as debt on the C4 covering the time period of April 2016.	539
4	NWP CONSULTING	6/3/2016	\$ 598.17	2500 PCS DOORBELLER	This should have been reported as debt on the C4 covering the time period of May 2016.	509
5	NWP CONSULTING	6/3/2016	\$ 550.00	DESIGN DOORBELLER	This should have been reported as debt on the C4 covering the time period of May 2016.	509
6	NWP CONSULTING	7/2/2016	\$ 439.46	FACEBOOK MEDIA CHARGES	This should have been reported as debt on the C4 covering the time period of May 2016.	509
7	NWP CONSULTING	7/2/2016	\$ 1,050.00	WEBSITE DESIGN	This should have been reported as debt on the C4 covering the time period of May 2016.	509
8	NWP CONSULTING	7/2/2016	\$ 1,500.00	RETAINER 1 OF 1	This should have been reported as debt on the C4 covering the time period of May 2016.	509
9	PAYCHEX	6/9/2016	\$ 967.07	CAMPAIGN MGR. FIRST BIWEEKLY PAYCHECK	This should have been reported as debt on the C4 covering the time period of May 2016.	509
10	PAYCHEX	6/10/2016	\$ 292.19	TPS TAXES	This should have been reported as debt on the C4 covering the time period of May 2016.	509
11	PAYCHEX	6/24/2016	\$ 1,109.07	CAMPAIGN MGR BIWEEKLY PAYCHECK	This should have been reported as debt on the C4 covering the time period of May 2016.	509
12	PAYCHEX	6/24/2016	\$ 318.54	TPS TAXES	This should have been reported as debt on the C4 covering the time period of May 2016.	509
13	NWP CONSULTING	7/19/2016	\$ 2,774.81	PRINT AND DESIGN OF JOINT PIECE	This should have been reported as debt on the 21 day pre-primary C4.	477
14	NWP CONSULTING	7/21/2016	\$ 2,117.94	DESIGN AND PRINTING FOR WOMEN SUPERCARD DESIGN AND PRINTING OF INTRO/BROAD SUPPORT	This should have been reported as debt on the 21 day pre-primary C4.	477
15	NWP CONSULTING	7/21/2016	\$ 4,717.02	MAILING	This should have been reported as debt on the 21 day pre-primary C4.	477
16	PAYCHEX	7/22/2016	\$ 1,420.72	PAYROLL	This should have been reported as debt on the 21 day pre-primary C4.	477
17	PAYCHEX	7/22/2016	\$ 416.17	TPS TAXES	This should have been reported as debt on the 21 day pre-primary C4.	477
18	PUBLISHER'S MAILING SERVICE	7/15/2016	\$ 3,693.35	PERMIT 544 POSTAGE	This should have been reported as debt on the 21 day pre-primary C4.	477
19	PUBLISHER'S MAILING SERVICE	7/15/2016	\$ 822.27	MAILING SERVICE FOR KAGI MAILING	This should have been reported as debt on the 21 day pre-primary C4.	477
20	PAYCHEX	8/4/2016	\$ 1,377.46	PAYROLL	This should have been reported as debt on the 7-day pre-primary C4.	463
21	PAYCHEX	8/5/2016	\$ 401.93	TPS TAXES	This should have been reported as debt on the 7-day pre-primary C4.	463
22	PAYCHEX	8/18/2016	\$ 1,044.43	PAYROLL	This should have been reported as debt on the 7-day pre-primary C4.	463
23	PAYCHEX	8/19/2016	\$ 323.13	TPS TAXES	This should have been reported as debt on the 7-day pre-primary C4.	463
24	PUBLISHER'S MAILING SERVICE	7/29/2016	\$ 2,815.84	JOINT MAILER WITH CINDY RYU	This should have been reported as debt on the 7-day pre-primary C4.	463
25	PAYCHEX	10/14/2016	\$ 346.32	PAYROLL	This should have been reported as debt on the post-primary C4.	415
26	PAYCHEX	9/2/2016	\$ 1,044.42	PAYROLL	This should have been reported as debt on the post-primary C4.	415
27	PAYCHEX	9/6/2016	\$ 316.84	TPS TAXES	This should have been reported as debt on the post-primary C4.	415
28	PAYCHEX	9/29/2016	\$ 1,201.55	PAYROLL	This should have been reported as debt on the post-primary C4.	415
29	PAYCHEX	9/29/2016	\$ 380.90	TPS TAXES	This should have been reported as debt on the post-primary C4.	415
30	PAYCHEX	11/14/2016	\$ 374.35	CAMPAIGN MGR FINAL PAYCHECK	This should have been reported as debt on the 7 day pre-general C4.	365
31	KAGI RUTH L	12/12/2016	\$ 729.98	NEW HARD DRIVE AND DATA BACK-UP	This should have been reported as debt on the C4 covering the time period of November 2016.	324
Total			\$ 35,427.53			

## Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		3766	As of --		11/1/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
				INVITATIONS AND REMIT ENVELOPS FOR			
1	OVERNIGHT PRINTING	4/13/2016	\$ 489.40	CAMPAIGN KICKOFF	Failure to identify number of items printed.	100692294	539
2	SCOTT CATHY	5/2/2016	\$ 9.85	NAMETAGS AND MARKERS	Failure to identify subvendor.	100698349	509
3	SCOTT CATHY	5/2/2016	\$ 5.98	ICE FOR KICKOFF	Failure to identify subvendor.	100698349	509
4	KAGI RUTH L	6/17/2016	\$ 56.47	CLIPBOARDS, ETC.	Failure to identify subvendor.	100707651	477
5	KAGI RUTH L	6/17/2016	\$ 43.40	STAMPS	Failure to identify subvendor.	100707651	477
6	KAGI RUTH L	6/17/2016	\$ 34.00	STAMPS	Failure to identify subvendor.	100707651	477
7	KAGI RUTH L	6/17/2016	\$ 47.12	PRINTER INK CARTRIDGE	Failure to identify subvendor.	100707651	477
8	KAGI RUTH L	6/17/2016	\$ 134.04	CAMPAIGN MATERIALS	Failure to identify subvendor.	100707651	477
9	KAGI RUTH L	7/2/2016	\$ 134.04	HAND BILLS	Failure to identify subvendor.	100707651	477
10	NWP CONSULTING	6/3/2016	\$ 598.17	2500 PCS DOORBELLER	Failure to identify subvendor and number of items printed.	100707651	477
11	NWP CONSULTING	7/2/2016	\$ 55.00	WEBSITE HOSTIN	Failure to identify subvendor.	100707651	477
				CAMPAIGN MGR. FIRST BIWEEKLY			
12	PAYCHEX	6/9/2016	\$ 967.07	PAYCHECK	Failure to identify person receiving actual paycheck.	100707651	477
13	PAYCHEX	6/10/2016	\$ 292.19	TPS TAXES	Failure to identify person receiving actual paycheck.	100707651	477
14	PAYCHEX	6/10/2016	\$ 167.45	PAYROLL SERVICE	Failure to identify person receiving actual paycheck.	100707651	477
15	PAYCHEX	6/24/2016	\$ 1,109.07	CAMPAIGN MGR BIWEEKLY PAYCHECK	Failure to identify person receiving actual paycheck.	100707651	477
16	PAYCHEX	6/24/2016	\$ 318.54	TPS TAXES	Failure to identify person receiving actual paycheck.	100707651	477
17	PAYCHEX	6/27/2016	\$ 129.45	PAYROLL SERVICES	Failure to identify person receiving actual paycheck.	100707651	477
18	SCOTT CATHY	7/2/2016	\$ 18.45	OFFICE SUPPLIES FOR CAMPAIGN MGR.	Failure to identify subvendor.	100707651	477
19	WINEBURG SHOSHANA	6/17/2016	\$ 71.24	NAMETAGS	Failure to identify subvendor.	100707651	477
20	KAGI RUTH L	7/19/2016	\$ 65.96	STAMPS FOR INVITATIONS	Failure to identify subvendor.	100711168	463
21	KAGI RUTH L	7/19/2016	\$ 37.36	PAPER AND ENVELOPES FOR INVITATIONS	Failure to identify subvendor.	100711168	463
22	NWP CONSULTING	7/19/2016	\$ 2,774.81	PRINT AND DESIGN OF JOINT PIECE	Failure to identify subvendor and number of items printed.	100711168	463
23	NWP CONSULTING	7/21/2016	\$ 2,117.94	DESIGN AND PRINTING FOR WOMEN	Failure to identify subvendor and number of items printed.	100711168	463
24	NWP CONSULTING	7/21/2016	\$ 4,717.02	SUPERCARD	Failure to identify subvendor and number of items printed.	100711168	463
				DESIGN AND PRINTING OF INTRO/BROAD			
				SUPPORT MAILING			
25	PAYCHEX	7/20/2016	\$ 15.08	TPS TAXES	Failure to identify person receiving actual paycheck.	100711168	463
26	PAYCHEX	7/22/2016	\$ 1,420.72	PAYROLL	Failure to identify person receiving actual paycheck.	100711168	463
27	PAYCHEX	7/22/2016	\$ 416.17	TPS TAXES	Failure to identify person receiving actual paycheck.	100711168	463
28	KAGI RUTH L	7/31/2016	\$ 126.51	VOLUNTEER THANK YOU PARTY	Failure to identify subvendor.	100719097	415
29	KAGI RUTH L	7/31/2016	\$ 34.00	POSTAGE FOR THANK YOUS	Failure to identify subvendor.	100719097	415
30	PAYCHEX	7/26/2016	\$ 79.45	EIB INVOICE	Failure to identify person receiving actual paycheck.	100719097	415

31 PAYCHEX	8/4/2016	\$ 1,377.46	PAYROLL	Failure to identify person receiving actual paycheck.	100719097	415
32 PAYCHEX	8/5/2016	\$ 401.93	TPS TAXES	Failure to identify person receiving actual paycheck.	100719097	415
33 PAYCHEX	8/5/2016	\$ 79.45	EIB INVOICE	Failure to identify person receiving actual paycheck.	100719097	415
34 PAYCHEX	8/18/2016	\$ 1,044.43	PAYROLL	Failure to identify person receiving actual paycheck.	100719097	415
35 PAYCHEX	8/19/2016	\$ 323.13	TPS TAXES	Failure to identify person receiving actual paycheck.	100719097	415
36 PAYCHEX	8/19/2016	\$ 67.45	EIB INVOICE	Failure to identify person receiving actual paycheck.	100719097	415
37 PUBLISHER'S MAILING SERVICE	7/29/2016	\$ 2,815.84	JOINT MAILER WITH CINDY RYU	Failure to identify number of items printed.	100719097	415
38 WINEBURG SHOSHANA	8/11/2016	\$ 54.00	METAL RODS FOR SIGNS	Failure to identify subvendor.	100719097	415
39 PAYCHEX	9/29/2016	\$ 67.45	EIB INVOICE	Failure to identify person receiving actual paycheck.	100728580	379
40 PAYCHEX	10/14/2016	\$ 346.32	PAYROLL	Failure to identify person receiving actual paycheck.	100728580	379
41 PAYCHEX	10/14/2016	\$ 62.06	TPS TAXES	Failure to identify person receiving actual paycheck.	100728580	379
42 PAYCHEX	10/14/2016	\$ 138.95	EIB INVOICE	Failure to identify person receiving actual paycheck.	100728580	379
43 PAYCHEX	9/2/2016	\$ 1,044.42	PAYROLL	Failure to identify person receiving actual paycheck.	100728580	379
44 PAYCHEX	9/6/2016	\$ 316.84	TPS TAXES	Failure to identify person receiving actual paycheck.	100728580	379
45 PAYCHEX	9/6/2016	\$ 67.45	EIB INVOICE	Failure to identify person receiving actual paycheck.	100728580	379
46 PAYCHEX	9/16/2016	\$ 67.45	EIB INVOICE	Failure to identify person receiving actual paycheck.	100728580	379
47 PAYCHEX	9/29/2016	\$ 1,201.55	PAYROLL	Failure to identify person receiving actual paycheck.	100728580	379
48 PAYCHEX	9/29/2016	\$ 380.90	TPS TAXES	Failure to identify person receiving actual paycheck.	100728580	379
49 WINEBURG SHOSHANA	10/15/2016	\$ 79.64	BROCHURE LABELS	Failure to identify number of items printed.	100728580	379
50 PAYCHEX	10/18/2016	\$ 138.95	EIB INVOICE	Failure to identify person receiving actual paycheck.	100733303	365
51 PAYCHEX	10/20/2016	\$ 59.30	TPS TAXES	Failure to identify person receiving actual paycheck.	100733303	365
52 PAYCHEX	11/14/2016	\$ 374.35	CAMPAIGN MGR FINAL PAYCHECK	Failure to identify person receiving actual paycheck.	100738742	324
53 PAYCHEX	11/15/2016	\$ 68.06	TPS TAXES	Failure to identify person receiving actual paycheck.	100738742	324
54 KAGI RUTH L	12/12/2016	\$ 28.49	PRINTER CARTRIDGE REPLACEMENT	Failure to identify subvendor.	100739890	295
55 KAGI RUTH L	12/12/2016	\$ 729.98	NEW HARD DRIVE AND DATA BACK-UP	Failure to identify subvendor.	100739890	295
<b>Total</b>		<b>\$ 27,821.80</b>				