

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Wed, 1 Nov at 11:20 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that Rep. Javier Valdez during his campaign in the 46th legislative district 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. Javier Valdez 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. Javier Valdez 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. Javier Valdez 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. Javier Valdez 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 -- 43

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100787571	C4	N		8/10/2017	9/14/2017	35
2	100787572	C4	Y		9/10/2017	9/14/2017	4
3	100791945	C4	N		10/10/2017	10/12/2017	2
4	100774380	C4	N		7/10/2017	7/11/2017	1
5	100786944	C4	N		9/10/2017	9/11/2017	1

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		142		As of -- 11/1/2017		
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	CN4 PARTNERS	6/14/2017	\$ 336.17	FLYERS & MAILING	This should have been reported as debt on the C4 covering the time period of May 2017.	142
2	CN4 PARTNERS	6/14/2017	\$ 750.00	DESIGN WORK	This should have been reported as debt on the C4 covering the time period of May 2017.	142
3	NIELSEN DEAN	6/14/2017	\$ 500.00	CONSULTING SERVICES	This should have been reported as debt on the C4 covering the time period of May 2017.	142
Total			\$ 1,586.17			

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		165	As of --		11/1/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	MILLER JANET	8/31/2017	\$ 57.46	REIMBURSEMENT FOR CHECK PRINTING	Failure to identify number of items printed, failure to identify subvendor.	100787572	51
2	VALDEZ JAVIER	6/8/2017	\$ 132.12	YARD SIGNS @ PRESTIGE COPY & PRINT	Failure to identify number of items printed.	100774380	114
3	CN4 PARTNERS	6/14/2017	\$ 99.15	HALF PAGE CARDS	Failure to identify number of items printed, failure to identify subvendor.	100774380	114
4	CN4 PARTNERS	6/14/2017	\$ 72.94	PRINTING	Failure to identify number of items printed, failure to identify subvendor.	100774380	114
5	CN4 PARTNERS	6/14/2017	\$ 336.17	FLYERS & MAILING	Failure to identify number of items printed, failure to identify subvendor.	100774380	114
		Total	\$ 697.84				