

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Wed, 1 Nov at 10:30 PM) via Portal Meta
To Whom it May Concern --

It has come to my attention that Rep. Drew Hansen 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. Drew Hansen 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. Drew Hansen 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. Drew Hansen 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. Drew Hansen 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 -- 181

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100758428	C4	Y		2/10/2017	5/4/2017	83
2	100758429	C4	Y		3/10/2017	5/4/2017	55
3	100758430	C4	Y		4/10/2017	5/4/2017	24
4	100712641	C4	Y		7/12/2016	7/29/2016	17
5	100712262	C4	N		7/26/2016	7/28/2016	2

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		2925		As of -- 11/1/2017		
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	STRIPE	4/21/2016	\$ 277.60	FEES	This should have been reported as debt on the C4 covering the time period of March 2016.	569
2	ALVIN ANDRUS	5/31/2016	\$ 608.00	ACCOUNTING	This should have been reported as debt on the C4 covering the time period of April 2016.	539
3	MASSIVE DESIGNS, INC	5/10/2016	\$ 2,175.00	FINANCIAL SOFTWARE DEVELOPMENT	This should have been reported as debt on the C4 covering the time period of April 2016.	539
4	NWP CONSULTING	5/6/2016	\$ 2,500.00	CONSULTING	This should have been reported as debt on the C4 covering the time period of April 2016.	539
5	STRIPE	5/11/2016	\$ 339.45	FEES	This should have been reported as debt on the C4 covering the time period of April 2016.	539
6	STRIPE	5/14/2016	\$ 261.48	FEES	This should have been reported as debt on the C4 covering the time period of April 2016.	539
7	ALVIN ANDRUS	6/30/2016	\$ 300.00	PDC ACCOUNTING AND EXPENSES	This should have been reported as debt on the C4 covering the time period of May 2016.	509
8	NWP CONSULTING	6/13/2016	\$ 281.44	CAMPAIGN MATERIAL	This should have been reported as debt on the C4 covering the time period of May 2016.	509
9	REMNANTZ LLC	6/3/2016	\$ 500.00	CAMPAIGN MANAGEMENT	This should have been reported as debt on the C4 covering the time period of May 2016.	509
10	REMNANTZ LLC	6/20/2016	\$ 500.00	CAMPAIGN MANAGEMENT	This should have been reported as debt on the C4 covering the time period of May 2016.	509
11	ALVIN ANDRUS	7/31/2016	\$ 461.55	PDC ACCOUNTING	This should have been reported as debt on the 7-day pre-primary C4.	463
12	ALVIN ANDRUS	9/30/2016	\$ 306.23	ACCOUNTING	This should have been reported as debt on the post-primary C4.	415
13	ALVIN ANDRUS	10/31/2016	\$ 316.91	ACCOUNTING	This should have been reported as debt on the 21 day pre-general C4.	379
14	ALVIN ANDRUS	9/30/2017	\$ 279.17	ACCOUNTING	This should have been reported as debt on the C4 covering the time period of August 2017.	51
15	MASSIVE DESIGNS, INC	9/11/2017	\$ 449.00	STRIPE LICENSE RENEWAL	This should have been reported as debt on the C4 covering the time period of August 2017.	51
Total			\$ 9,555.83			

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		3831	As of --		11/1/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	23RD LDD	5/2/2016	\$ 212.50	ARMED FORCES AD	Failure to identify subvendor.	100697722	509
2	ALVIN ANDRUS	5/31/2016	\$ 77.26	INTERNET, MILEAGE	Failure to identify subvendor. (internet)	100697722	509
					Failure to identify subvendor, number of items		
3	NWP CONSULTING	6/13/2016	\$ 281.44	CAMPAIGN MATERIAL	printed.	100712641	477
4	ALVIN ANDRUS	8/31/2016	\$ 56.50	EXPENSES	Failure to identify subvendor.	100717960	415
5	ALVIN ANDRUS	1/31/2016	\$ 27.91	INTERNET	Failure to identify subvendor. (internet)	100677346	630
6	ALVIN ANDRUS	12/30/2015	\$ 29.88	INTERNET	Failure to identify subvendor. (internet)	100673071	660
7	ALVIN ANDRUS	4/30/2016	\$ 27.90	INTERNET	Failure to identify subvendor. (internet)	100692811	539
8	ALVIN ANDRUS	2/29/2016	\$ 27.91	INTERNET	Failure to identify subvendor. (internet)	100680051	601
		Total	\$ 741.30				