

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Sun, 29 Oct at 7:31 PM) via Portal [Meta](#)

To Whom it May Concern --

It has come to my attention that Manka Dhingra has once again violated provisions 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, Manka Dhingra has failed on numerous occasions to do this.

Report #	Type	Amended	Deposit Date	Due Date	Date Submitted	Days Late
100792513	C3	Y	3/3/2017	4/10/2017	10/16/2017	189
100796100	C4	Y		7/25/2017	10/27/2017	94
100796101	C4	Y		9/11/2017	10/27/2017	46
100792522	C3	Y	9/27/2017	10/2/2017	10/16/2017	14
100788469	C3	Y	9/8/2017	9/11/2017	9/22/2017	11
100796102	C4	Y		10/17/2017	10/27/2017	10
100796213	C4	Y		10/17/2017	10/27/2017	10

2) Failure to provide complete records of contributions and expenditures during open book viewing period. (Violation of RCW 42.17A.235(4))

State law requires that during the 8 days prior to the election, the candidate's committee must make their campaign books available to members of the public for inspection. Additionally,

According to the PDC: "Loan agreements are part of the campaign records and should be included with the books of account when making them available for inspection."

(Source: <https://www.pdc.wa.gov/learn/publications/campaign-loans-and-loan-agreements>)

I made a request to Dhingra's treasurer for an appointment to view the campaign books during the 8 day time window. They obliged (after considerable delay and my filing a PDC complaint), and I went to their headquarters to view their books on 7/31/2017.

While viewing the books, I noticed that there were no copies of the written loan instruments for the many Dhingra campaign loans. This did not seem right to me.

I sent Dhingra's treasurer an email to let him know the written loan instruments were not part of the books I inspected, and requested that he e-mail them to me. Dhingra's treasurer refused. *See attached.*

On information and belief, the Dhingra campaign was required to provide me with the campaign's mileage log. Dhingra's treasurer believed that this was not required to be provided either. This is a separate violation of the same statute.

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.

Dhingra illegally failed to include the subvendor/number of items printed for the following expenditures:

Vendor	Date	Amount	Description
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NORTHWEST PASSAGE CONSULTING	2017-10-13	3689.16	OVERNIGHT PRINTING - PRINTING
NORTHWEST PASSAGE CONSULTING	2017-05-18	1389	OVERNIGHT PRINTING - SEATTLE
NORTHWEST PASSAGE CONSULTING	2017-03-21	1064.15	NORTHWEST PASSAGE CONSULTING
NORTHWEST PASSAGE CONSULTING	2017-07-22	778	NORTHWEST PASSAGE CONSULTING
NORTHWEST PASSAGE CONSULTING	2017-04-25	625	OVERNIGHT PRINTING - SEATTLE
NORTHWEST PASSAGE CONSULTING	2017-09-03	571.52	NORTHWEST PASSAGE CONSULTING
NORTHWEST PASSAGE CONSULTING	2017-10-13	476.36	OVERNIGHT PRINTING - STICKERS
NORTHWEST PASSAGE CONSULTING	2017-03-23	323.35	OVERNIGHT PRINTING - SEATTLE
NORTHWEST PASSAGE CONSULTING	2017-07-22	321.41	OVERNIGHT PRINTING - POSTCARDS
NORTHWEST PASSAGE CONSULTING	2017-10-13	284.89	OVERNIGHT PRINTING - SIGN PRINTING
NORTHWEST PASSAGE CONSULTING	2017-05-09	276.4	NORTHWEST PASSAGE CONSULTING
NORTHWEST PASSAGE CONSULTING	2017-04-03	111.75	NORTHWEST PASSAGE CONSULTING
NORTHWEST PASSAGE CONSULTING	2017-04-03	79	NORTHWEST PASSAGE CONSULTING
FEDEX OFFICE	2017-09-07	71.5	PRINTING

The PDC should investigate the possibility that Manka Dhingra committed the above violations maliciously, if these violations were committed in an effort to evade public scrutiny and campaign finance disclosure, 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



Glen Morgan <glenmorgan89@gmail.com>

Written loan instruments

Andy Lo <treasurer@andy-lo.com>
To: Glen Morgan <glenmorgan89@gmail.com>

Tue, Aug 1, 2017 at 8:50 AM

Hi Glen,

The PDC guidelines say: "books of account" means a ledger or similar listing of contributions, expenditures and debts, such as a campaign or committee is required to file regularly with the PDC, but current as of the most recent business day. As a practical matter, campaigns and committees might want to consider compiling PDC forms to be available on a daily basis for inspection upon request (but not required for filing), like C-3 and C-4 forms.'

The PDC guidelines do not reference mileage logs as part of the "books of account." We provided what was required.

Thanks,

Andy Lo
9245 Sand Point Way NE
Seattle, WA 98115
[206.335.8815](tel:206.335.8815)

On 7/31/17 6:52 PM, Glen Morgan wrote:

Andy,

Thanks for your response. I disagree with your interpretation, but I suppose the PDC can arbitrate that issue. Do you also consider the mileage logs as required under RCW to be not available as well?

Best regards,

Glen Morgan
[\(360\)791-6556](tel:3607916556)

On Jul 31, 2017 1:13 PM, "Andy Lo" <treasurer@andy-lo.com> wrote:

Hi Glen,

I believe we are only required to provide ledgers for public inspection. Please see the PDC guidelines here: <https://www.pdc.wa.gov/learn/publications/candidate-instructions/public-inspection-campaign-records>

Thanks,

Andy Lo
9245 Sand Point Way NE
Seattle, WA 98115
[206.335.8815](tel:206.335.8815)

On 7/31/17 1:09 PM, Glen Morgan wrote:

Andy,

I am looking for the written loan instruments as required under RCW 42.17a.465 as applicable to all loans (in kind or cash) provided to manka dhingra campaign. Documents provided here indicate that loans were made, but the required written instruments are not here.

Can you email those to me?

Best regards,

10/29/2017

Gmail - Written loan instruments

Glen Morgan
(360) 791-6556 cell.