

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Sun, 15 Oct at 12:55 AM) via Portal Meta To Whom it May Concern --

It has come to my attention that the 19th 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 19th LD Democrats have failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

It is important to note that in 2016, **the Committee did not file a single C3 or C4 report until AFTER the election**, despite being obligated to do full reporting. This is a very serious violation of state law.

2) 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 Committee illegally failed to break down the following expenses. (See **Exhibit B - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that the 19th 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 B -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		432			As of --		10/15/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today	
1	O'CONNOR SUSAN	8/23/2016	\$ 178.30	ANNUAL PICNIC FOOD & SUPPLIES	Failure to identify subvendor.	100740134	398	
2	WAHKIAKUM DEMOCRATS	8/20/2017	\$ 63.65	FOOD FOR 19TH LD ANNUAL PICNIC	Failure to identify subvendor.	100785085	34	
Total			\$ 241.95					

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 2973

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100740127	C4	N		2/10/2016	1/7/2017	332
2	100740128	C4	N		3/10/2016	1/7/2017	303
3	100740121	C3	N	2/29/2016	3/10/2016	1/7/2017	303
4	100740129	C4	N		4/11/2016	1/7/2017	271
5	100740130	C4	N		5/10/2016	1/7/2017	242
6	100740122	C3	N	4/11/2016	5/10/2016	1/7/2017	242
7	100740131	C4	N		6/10/2016	1/7/2017	211
8	100740123	C3	N	6/30/2016	7/4/2016	1/7/2017	187
9	100740132	C4	N		7/12/2016	1/7/2017	179
10	100740133	C4	N		7/26/2016	1/7/2017	165
11	100740124	C3	N	8/24/2016	8/29/2016	1/7/2017	131
12	100740134	C4	N		9/12/2016	1/7/2017	117
13	100740126	C3	N	10/3/2016	10/10/2016	1/7/2017	89
14	100740135	C4	N		10/18/2016	1/7/2017	81
15	100740136	C4	N		11/1/2016	1/7/2017	67
16	100740137	C4	N		12/12/2016	1/7/2017	26
17	100774925	C3	N	6/30/2017	7/3/2017	7/13/2017	10
18	100752553	C4	N		3/10/2017	3/13/2017	3
19	100790537	C3	N	9/30/2017	10/2/2017	10/5/2017	3
20	100774926	C4	N		7/11/2017	7/13/2017	2
21	100781565	C3	N	7/31/2017	8/7/2017	8/9/2017	2
22	100756195	C4	N		4/10/2017	4/11/2017	1
23	100767719	C4	N		6/10/2017	6/11/2017	1
24	100778983	C4	N		7/25/2017	7/26/2017	1
25	100756194	C3	N	3/31/2017	4/10/2017	4/11/2017	1
26	100756193	C3	N	3/20/2017	4/10/2017	4/11/2017	1
27	100767718	C3	N	5/31/2017	6/10/2017	6/11/2017	1
28	100785084	C3	N	8/31/2017	9/4/2017	9/5/2017	1