

## **File a Formal Complaint - Glen Morgan**

[Glenmorgan89](#) reported 14 Oct at 10:37 PM) via Portal [Meta](#)  
To Whom it May Concern --

It has come to my attention that the Mason County Democratic Central Committee has 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 Mason County Democratic Central Committee 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.

The Mason County Democratic Central Committee 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.

The Mason County Democratic Central Committee illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that the Mason County Democratic Central Committee 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 A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 2841

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100750044	C4	Y		1/11/2016	2/27/2017	413
2	100750422	C4	Y		3/10/2016	3/1/2017	356
3	100750423	C4	Y		5/10/2016	3/1/2017	295
4	100766735	C4	Y		10/18/2016	6/8/2017	233
5	100750424	C4	Y		7/12/2016	3/1/2017	232
6	100757884	C4	Y		10/18/2016	5/1/2017	195
7	100750425	C4	Y		9/12/2016	3/1/2017	170
8	100750426	C4	Y		10/18/2016	3/1/2017	134
9	100754494	C4	Y		2/10/2017	4/5/2017	54
10	100754493	C3	Y	1/23/2017	2/10/2017	4/5/2017	54
11	100704855	C4	N		5/10/2016	7/1/2016	52
12	100704854	C3	N	4/27/2016	5/10/2016	7/1/2016	52
13	100780469	C3	N	6/13/2017	6/19/2017	8/3/2017	45
14	100720960	C3	N	8/4/2016	8/8/2016	9/13/2016	36
15	100708513	C3	N	5/22/2016	6/10/2016	7/14/2016	34
16	100685026	C4	N		2/10/2016	3/9/2016	28
17	100684349	C3	N	1/22/2016	2/10/2016	3/9/2016	28
18	100684350	C3	Y	1/22/2016	2/10/2016	3/9/2016	28
19	100739945	C3	N	11/15/2016	12/10/2016	1/6/2017	27
20	100754512	C4	Y		3/10/2017	4/5/2017	26
21	100754508	C3	Y	2/27/2017	3/10/2017	4/5/2017	26
22	100739946	C4	N		12/12/2016	1/6/2017	25
23	100715527	C3	N	7/14/2016	7/18/2016	8/12/2016	25
24	100751006	C4	N		2/10/2017	3/6/2017	24
25	100780622	C4	N		7/11/2017	8/4/2017	24
26	100735430	C3	N	10/20/2016	10/24/2016	11/16/2016	23
27	100720961	C3	N	8/17/2016	8/22/2016	9/13/2016	22
28	100704858	C4	N		6/10/2016	7/1/2016	21
29	100715842	C4	N		7/26/2016	8/15/2016	20
30	100692114	C4	N		4/11/2016	4/29/2016	18
31	100692113	C3	N	3/30/2016	4/11/2016	4/29/2016	18
32	100735428	C4	N		11/1/2016	11/16/2016	15
33	100720962	C3	N	8/23/2016	8/29/2016	9/13/2016	15
34	100672590	C4	N		12/10/2015	12/22/2015	12
35	100672588	C3	N	11/30/2015	12/10/2015	12/22/2015	12
36	100676027	C4	N		1/11/2016	1/22/2016	11
37	100676026	C3	N	12/15/2015	1/11/2016	1/22/2016	11
38	100780623	C4	N		7/25/2017	8/4/2017	10
39	100724815	C3	N	9/26/2016	10/3/2016	10/9/2016	6
40	100708515	C4	N		7/12/2016	7/14/2016	2
41	100741734	C4	N		1/10/2017	1/12/2017	2
42	100741736	C3	N	12/15/2016	1/10/2017	1/12/2017	2
43	100741735	C3	N	12/15/2016	1/10/2017	1/12/2017	2
44	100686287	C4	N		3/10/2016	3/11/2016	1
45	100720963	C4	N		9/12/2016	9/13/2016	1
46	100686286	C3	N	2/24/2016	3/10/2016	3/11/2016	1

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

Violation # Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1 LIBERTY MUTUAL INSURANCE	11/12/2015	\$ 360.00	LIABILITY INS. FOR 2016	This should have been reported as debt on the 7 day pre-general C4.	718
2 CITY OF SHELTON	11/5/2015	\$ 300.00	DAMAGE DEPOSIT FOR ANNUAL HOLIDAY PARTY	This should have been reported as debt on the 7 day pre-general C4.	718
3 PHILA HOLDING CO. LLC	3/3/2016	\$ 942.50	SECURITY DEPOSIT, APPLICATION FEE & PRORATED RENT FOR MARCH 2016	This should have been reported as debt on the C4 covering the time period of February 2016.	583
4 PHILA HOLDING CO. LLC	4/1/2016	\$ 575.00	MONTHLY RENT FOR CAMPAIGN OFFICE	This should have been reported as debt on the C4 covering the time period of March 2016.	551
5 REED ROSLYNNE	5/22/2016	\$ 258.55	BLANKET GIFT FOR GUEST SPEAKER	This should have been reported as debt on the C4 covering the time period of April 2016.	521
6 LUCKY DOG CASINO	5/22/2016	\$ 3,672.00	COST + GRATUITY FOR 2016 KENNEDY DINNER	This should have been reported as debt on the C4 covering the time period of April 2016.	521
7 PHILA HOLDING CO. LLC	5/22/2016	\$ 575.00	RENT AT 121 RAILROAD IN SHELTON, WA	This should have been reported as debt on the C4 covering the time period of April 2016.	521
8 PHILA HOLDING CO. LLC	6/2/2016	\$ 575.00	MONTHLY RENT FOR OFFICE	This should have been reported as debt on the C4 covering the time period of May 2016.	491
9 PHILA HOLDING CO. LLC	8/8/2016	\$ 575.00	MONTHLY RENT FOR CAMPAIGN OFFICE	This should have been reported as debt on the 7-day pre-primary C4.	445
10 PHILA HOLDING CO. LLC	9/5/2016	\$ 575.00	MONTHLY RENT	This should have been reported as debt on the post-primary C4.	397
11 PHILA HOLDING CO. LLC	10/20/2016	\$ 575.00	RENT	This should have been reported as debt on the 21 day pre-general C4.	361
12 CITY OF SHELTON	11/15/2016	\$ 570.00	POTLUCK/VICTORY PARTY	This should have been reported as debt on the 7 day pre-general C4.	347
13 DOWNTOWN MINI STORAGE	11/15/2016	\$ 540.00	STORAGE LOCKER FOR 1 YEAR	This should have been reported as debt on the 7 day pre-general C4.	347
14 PHILA HOLDING CO. LLC	11/15/2016	\$ 287.50	OFFICE RENT FOR 11/1 TO 11/15/16	This should have been reported as debt on the 7 day pre-general C4.	347
15 CAPITOL CITY PRESS	1/23/2017	\$ 266.81	2000 REMIT ENVELOPES	This should have been reported as debt on the C4 covering the time period of December 2016.	277
16 LITTLE CREEK CASINO	3/6/2017	\$ 500.00	DEPOSIT FOR KENNEDY DINNER	This should have been reported as debt on the C4 covering the time period of February 2017.	218
17 MCLEAN DIANE K	3/6/2017	\$ 343.00	REIMBURSE FOR 672 STAMPS - 2017 DUES		
18 HAMILTON MARCIA	5/21/2017	\$ 980.00	ASK	This should have been reported as debt on the C4 covering the time period of February 2017.	218
19 LITTLE CREEK CASINO	7/10/2017	\$ 4,001.04	ISLAMIC WOMAN COLLAGE	This should have been reported as debt on the C4 covering the time period of April 2017.	157
			FOOD COST FOR KENNEDY DINNER	This should have been reported as debt on the C4 covering the time period of May 2017.	126
<b>Total</b>		<b>\$ 16,471.40</b>			

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

Approximate Cumulative Days Late --		5257	As of --		10/14/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	WALSH BRIAN	11/13/2015	\$ 11.00	REPAYMENT FOR LIQUOR PERMIT AT ANNUAL HOLIDAY PARTY	Failure to identify subvendor.	100672590	674
2	KING LARRY	12/9/2015	\$ 58.07	BEVERAGES FOR 2015 HOLIDAY PARTY	Failure to identify subvendor.	100750044	642
3	REED ROSLYNNE	12/9/2015	\$ 98.00	POSTAGE FOR 215 ITEMS	Failure to identify subvendor.	100750044	642
4	ROUSH JANE	12/9/2015	\$ 108.78	POSTAGE FOR 222 MAILERS	Failure to identify subvendor.	100750044	642
5	KING LARRY	2/4/2016	\$ 90.78	CAMPAIGN BUTTON BLANKS	Failure to identify subvendor.	100750422	583
6	KING LARRY	2/4/2016	\$ 88.00	RV PARK FEES FOR WSDCC MEETING IN WENATACHEE	Failure to identify subvendor.	100750422	583
7	REED ROSLYNNE	2/4/2016	\$ 45.62	THUMB DRIVES FOR PCOS	Failure to identify subvendor.	100750422	583
8	REED ROSLYNNE	3/8/2016	\$ 40.99	POSTCARDS FOR DUES REMINDER MAILING	Failure to identify subvendor.	100692114	551
9	REED ROSLYNNE	3/11/2016	\$ 21.08	3 THUMB DRIVES	Failure to identify subvendor.	100692114	551
10	MCLEAN KATHERINE	4/1/2016	\$ 14.40	POSTAGE FOR MONTHLY NEWSLETTER	Failure to identify subvendor.	100750423	521
11	WALSH BRIAN	4/1/2016	\$ 27.21	KEYS FOR TREASURER'S FILE CABINET	Failure to identify subvendor.	100750423	521
12	KING LARRY	5/22/2016	\$ 121.66	KEYS FOR OFFICE DOORS AT 121 RAILROAD IN SHELTON	Failure to identify subvendor.	100704858	491
13	MCLEAN KATHERINE	5/22/2016	\$ 20.47	COFFEE & COOKIES FOR MONTHLY MEETING	Failure to identify subvendor.	100704858	491
14	MCLEAN KATHERINE	5/22/2016	\$ 25.00	REIMBURSEMENT FOR RENTAL OF ROOM IN ALLYN FOR MEETING	Failure to identify subvendor.	100704858	491
15	REED ROSLYNNE	5/22/2016	\$ 258.55	BLANKET GIFT FOR GUEST SPEAKER	Failure to identify subvendor.	100704858	491
16	REED ROSLYNNE	5/22/2016	\$ 50.14	POSTAGE FOR 2016 KENNEDY DINNER INVITATIONS	Failure to identify subvendor.	100704858	491
17	REED ROSLYNNE	5/22/2016	\$ 144.99	PRINTING ASSOCIATED WITH 2016 DINNER & AUCTION	Failure to identify subvendor, failure to identify number of items printed.	100704858	491
18	ROUSH JANE	7/14/2016	\$ 141.00	REIMBURSE FOR SUMMER 2016 ASK POSTAGE	Failure to identify subvendor.	100715842	445
19	KING LARRY	8/18/2016	\$ 113.06	REIMBURSEMENT FOR OFFICE SUPPLIES	Failure to identify subvendor.	100750425	397
20	KING LARRY	10/16/2016	\$ 125.05	OFFICE SUPPLIES	Failure to identify subvendor.	100766735	361
21	KING LARRY	12/15/2016	\$ 60.76	REIMBURSEMENT	Failure to identify subvendor.	100741734	277
22	WALSH BRIAN	12/15/2016	\$ 24.44	CITY DUMP FEE FOR SOFA	Failure to identify subvendor.	100741734	277
23	MCLEAN DIANE K	3/6/2017	\$ 142.53	REIMBURSE FOR PRINTER TONER CARTRIDGE	Failure to identify subvendor.	100754522	187
24	MCLEAN DIANE K	3/6/2017	\$ 343.00	REIMBURSE FOR 672 STAMPS - 2017 DUES ASK	Failure to identify subvendor.	100754522	187
25	O'DONNELL MARLAYNA	3/9/2017	\$ 60.60	REIMBURSE FOR SUPPLIES FOR 2017 DUES ASK	Failure to identify subvendor.	100754522	187
26	HAMILTON MARCIA	6/6/2017	\$ 40.49	POSTCARDS FOR KENNEDY DINNER	Failure to identify subvendor.	100780622	95
27	HAMILTON MARCIA	6/6/2017	\$ 37.99	BLACK INK CARTRIDGE	Failure to identify subvendor.	100780622	95
28	HAMILTON MARCIA	6/6/2017	\$ 41.99	COLORLED INK CARTRIDGES	Failure to identify subvendor.	100780622	95
29	HAMILTON MARCIA	6/6/2017	\$ 57.49	AUCTION SLIPS FOR KENNEDY DINNER	Failure to identify subvendor, failure to identify number of items printed.	100780622	95
30	MCLEAN DIANE	6/28/2017	\$ 150.00	ALLYN DAYS BOOTH RENTAL REIMBURSEMENT	Failure to identify subvendor.	100780622	95
31	MCLEAN KATHERINE	8/10/2017	\$ 24.93	OFFICE SUPPLIES REIMBURSEMENT	Failure to identify subvendor.	100786274	33
32	MCLEAN KATHERINE	8/10/2017	\$ 49.00	STAMPS REIMBURSEMENT	Failure to identify subvendor.	100786274	33
33	MCLEAN KATHERINE	8/10/2017	\$ 113.47	PRINTING REIMBURSEMENT FOR ALLYN DAYS	Failure to identify subvendor, failure to identify number of items printed.	100786274	33
34	MCLEAN KATHERINE	8/10/2017	\$ 55.37	CHAIRS FOR ALLYN DAYS BOOTH	Failure to identify subvendor.	100786274	33

**Total \$ 2,805.91**