

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Fri, 13 Oct at 1:32 AM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that the Cowlitz County Democratic Central Committee 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 Cowlitz 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 Cowlitz 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 Cowlitz 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 Cowlitz 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 C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		1224			As of --		10/13/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today	
1	PURCELL MARK	8/30/2016	\$ 800.00	2 MONTHS OFFICE RENTAL	Failure to identify subvendor.	100723483	396	
2	MCLAIN PAUL	8/1/2016	\$ 60.00	INSURANCE FOR COWLITZ COUNTY FAIR BOOTH	Failure to identify subvendor.	100723483	396	
3	MCLAIN PAUL	9/22/2016	\$ 300.00	REIMBURSEMENT FOR SIGNS, BUTTONS, AND BUMPER STICKERS	Failure to identify subvendor, failure to identify number of items printed.	100728436	360	
4	MCLAIN PAUL	2/9/2017	\$ 87.45	LASER PRINTER POSTCARDS FOR SAVE THE DATE CARDS FOR GIVE EM HELL HARRY	Failure to identify subvendor.	100752276	217	
5	CORRIE TWYLLA S	2/3/2017	\$ 93.70	ENVELOPES AND INK FOR GIVE EM HELL HARRY MAILING	Failure to identify subvendor, failure to identify number of items printed.	100752276	217	
6	ELDRIDGE DEBRA	5/24/2017	\$ 317.18	ITEMS BOUGHT FOR GIVE EM HELL DINNER & AUCTION	Failure to identify subvendor.	100768971	125	
7	CORRIE TWYLLA S	6/2/2017	\$ 44.31	INK FOR PRINTING	Failure to identify subvendor.	100774730	94	
8	CORRIE TWYLLA S	6/2/2017	\$ 195.61	AUCTION ITEMS FOR GIVE EM HELL HARRY	Failure to identify subvendor.	100774730	94	
9	CORRIE TWYLLA S	6/2/2017	\$ 206.69	AUCTION ITEMS FOR GIVE EM HELL HARRY	Failure to identify subvendor.	100774730	94	
10	MCLAIN PAUL	6/27/2017	\$ 172.94	PRINTING BOOKLETS FOR GIVE EM HELL HARRY AUCTION	Failure to identify subvendor, failure to identify number of items printed.	100774730	94	
11	RICHIE MEGAN	6/24/2017	\$ 81.76	DECORATIONS FOR GIVE EM HELL HARRY AUCTION	Failure to identify subvendor.	100774730	94	
12	THOMPSON MELISSA	6/29/2017	\$ 229.07	AUCTION ITEMS PURCHASED FOR GIVE EM HELL HARRY AUCTION	Failure to identify subvendor.	100774730	94	
13	CORRIE TWYLLA S	6/29/2017	\$ 50.00	INSURANCE FOR GO 4TH BOOTH	Failure to identify subvendor.	100774730	94	
14	CORRIE TWYLLA S	6/29/2017	\$ 50.00	INSURANCE FOR COWLITZ COUNTY FAIR BOOTH	Failure to identify subvendor.	100774730	94	
15	THOMPSON MELISSA	8/21/2017	\$ 19.95	REGISTRATION FOR GREATER GIVING FUNDRAISING SEMINAR	Failure to identify subvendor.	100786965	32	
16	THOMPSON MELISSA	8/21/2017	\$ 30.05	GAS & DINNER FROM TRAVELING TO MERCER ISLAND FOR THE SEMINAR	Failure to identify subvendor.	100786965	32	
Total			\$ 2,738.71					

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 93

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Lat
1	100672840	C3	N	11/9/2015	12/10/2015	12/29/2015	19
2	100676291	C4	Y		1/11/2016	1/27/2016	16
3	100723482	C3	N	9/14/2016	9/19/2016	10/1/2016	12
4	100733717	C3	N	10/19/2016	10/24/2016	11/3/2016	10
5	100728392	C3	N	10/5/2016	10/10/2016	10/18/2016	8
6	100768967	C3	N	6/2/2017	6/5/2017	6/12/2017	7
7	100738747	C4	N		12/12/2016	12/18/2016	6
8	100769551	C3	N	6/9/2017	6/12/2017	6/16/2017	4
9	100756389	C4	N		4/10/2017	4/13/2017	3
10	100733720	C4	N		11/1/2016	11/3/2016	2
11	100768971	C4	N		6/10/2017	6/12/2017	2
12	100690557	C4	N		4/11/2016	4/12/2016	1
13	100695197	C4	N		5/10/2016	5/11/2016	1
14	100702343	C3	N	6/10/2016	6/13/2016	6/14/2016	1
15	100707755	C3	N	7/9/2016	7/11/2016	7/12/2016	1

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Exhibit B -- Illegal failure to timely report Debt

Violation #	Vendor	Approximate Cumulative Days Late -- 2936		Description	As of -- 10/13/2017		Approx. days late
		Date	Amount		Debt that was illegally not reported.		
1	SUMMERLAND CATERING SERVICES	11/8/2016	\$ 1,000.00	FOOD FOR ELECTION NIGHT PARTY	This should have been reported as debt on the 7 day pre-general C4.		346
2	H & H STORAGE	2/1/2016	\$ 600.00	RENT FOR STORAGE UNIT	This should have been reported as debt on the C4 covering the time period of January 2016.		611
3	GREATER GIVING	1/3/2017	\$ 795.00	RENEWAL ONLINE SERVICES FOR GIVE EM HELL HARRY AUCTION	This should have been reported as debt on the C4 covering the time period of December 2016.		276
4	THE DAILY NEWS	3/9/2016	\$ 695.00	4 ADS FOR PRESIDENTIAL PRECINCT CAUCUSES	This should have been reported as debt on the C4 covering the time period of February 2016.		582
5	PURCELL MARK	8/30/2016	\$ 800.00	2 MONTHS OFFICE RENTAL	This should have been reported as debt on the 7-day pre-primary C4.		444
6	MCLAIN PAUL	9/22/2016	\$ 300.00	REIMBURSEMENT FOR SIGNS, BUTTONS, AND BUMPER STICKERS	This should have been reported as debt on the post-primary C4.		396
7	H & H STORAGE	1/16/2017	\$ 660.00	STORAGE UNIT RENEWAL	This should have been reported as debt on the C4 covering the time period of December 2016.		276
8	ELDRIDGE DEBRA	5/24/2017	\$ 317.18	ITEMS BOUGHT FOR GIVE EM HELL DINNER & AUCTION	This should have been reported as debt on the C4 covering the time period of April 2017.		156
9	COWLITZ REGIONAL CONFERENCE CENTER	6/13/2017	\$ 9,797.45	RENTAL SPACE & CATERING FOR GIVE EM HELL HARRY AUCTION	This should have been reported as debt on the C4 covering the time period of May 2017.		125
Total			\$ 14,964.63				