

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

[Glenmorgan89](#) reported (Fri, 13 Oct at 12:52 AM) via Portal **Meta**  
To Whom it May Concern --

It has come to my attention that the 7th 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 7th District Democrats 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 7th District Democrats 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 7th District Democrats 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 7th 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 C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --					1466	As of --		10/13/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today		
1	SAYLES TERRY	8/13/2016	\$ 150.00	RENT AND REFRESHMENTS FOR TRAINING VENUE IN REPUBLIC	Failure to identify subvendor.	100718074	396		
2	CLARK CHRISTINE	4/26/2016	\$ 64.02	COPYING AND PRINTER CARTRIDGE FOR CAUCUS	Failure to identify number of items printed and subvendor.	100692410	520		
3	DAVIES DARLENE	3/30/2016	\$ 60.10	CAUCUS SIGNS, SUPPLIES, AND COPIES	Failure to identify number of items printed and subvendor.	100687902	550		
Total			\$ 274.12						

Exhibit B -- Illegal failure to timely report Debt

kimate Cumulative Days Late --		1193	As of -- 10/13/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	MEAD SCHOOL DISTRICT	2/10/2016	\$ 265.00	RENTAL FEE FOR PRIMARY CAUCUS ROOM	This should have been reported as debt on the C4 covering the time period of January 2016.	611
2	MEAD SCHOOL DISTRICT	3/1/2016	\$ 269.50	CAUCUS SITE RENTAL -- MIDWAY	This should have been reported as debt on the C4 covering the time period of February 2016.	582
Total			\$ 534.50			

## Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- **446**

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100754921	C4	N		2/10/2017	4/7/2017	56
2	100754923	C3	N	1/17/2017	2/10/2017	4/7/2017	56
3	100779641	C4	N		6/10/2017	7/31/2017	51
4	100712351	C3	N	6/15/2016	6/20/2016	7/28/2016	38
5	100754920	C4	N		3/10/2017	4/7/2017	28
6	100714893	C4	N		7/12/2016	8/8/2016	27
7	100684216	C3	N	1/13/2016	2/10/2016	3/8/2016	27
8	100673351	C3	N	11/9/2015	12/10/2015	1/5/2016	26
9	100673352	C3	N	11/19/2015	12/10/2015	1/5/2016	26
10	100673353	C3	Y	11/19/2015	12/10/2015	1/5/2016	26
11	100739397	C4	N		12/12/2016	1/2/2017	21
12	100779642	C4	N		7/11/2017	7/31/2017	20
13	100712350	C4	N		7/12/2016	7/28/2016	16
14	100733057	C4	N		10/18/2016	11/1/2016	14
15	100724145	C3	N	9/19/2016	9/26/2016	10/3/2016	7
16	100779643	C4	N		7/25/2017	7/31/2017	6
17	100733056	C3	N	10/24/2016	10/31/2016	11/1/2016	1