

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

[Glenmorgan89](#) reported (Thu, 12 Oct at 11:56 PM) via Portal Meta To Whom it May Concern --

It has come to my attention that the 49th 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 49th 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 49th 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 49th 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 49th 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 --		1003		As of --		10/12/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	WORK VICKI M MS	5/15/2016	\$ 262.24	COPIES	Failure to identify number of items printed, subvendor.	100700485	489
2	LINEHAM THOMAS J MR	5/15/2016	\$ 75.84	COPIES	Failure to identify number of items printed, subvendor.	100700485	489
3	LUX KEVIN	5/15/2016	\$ 250.00	TRAINING	Failure to identify subvendor.	100700485	489
4	ADCO PRINTING & GRAPHICS	10/8/2016	\$ 190.78	REMIT ENVELOPES	Failure to identify number of items printed.	100729158	359
5	WORK VICKI M MS	4/8/2017	\$ 168.02	49TH LD FLYERS	Failure to identify number of items printed, subvendor.	100770515	155
<b>Total</b>			<b>\$ 946.88</b>				

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

Cumulative Days Late --				As of -- 10/12/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late	
							1644
1	TOMMY O'S	10/15/2015	\$ 685.08	FOOD FOR FUNDRAISER	This should have been reported as debt on the 21 day pre-general C4.	730	10/27/2015
2	WORK VICKI M MS	5/15/2016	\$ 262.24	COPIES	This should have been reported as debt on the C4 covering the time period of April 2016	519	6/10/2016
3	CLARK COLLEGE	9/9/2016	\$ 253.00	ARCHER GALLERY	This should have been reported as debt on the post-primary C4.	395	10/18/2016
4	TOMMY OS	10/12/2016	\$ 507.22	CLARK COLLEGE, GALLERY	This should have been reported as debt on the post-primary C4.	395	10/18/2016
<b>Total</b>			<b>\$ 1,707.54</b>				

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

Approximate Cumulative Days Late -- 1465

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100695873	C4	N		2/10/2016	5/18/2016	98
2	100736949	C3	N	9/15/2016	9/19/2016	12/8/2016	80
3	100783870	C4	N		6/10/2017	8/28/2017	79
4	100783868	C3	N	6/5/2017	6/12/2017	8/28/2017	77
5	100770514	C4	N		4/10/2017	6/20/2017	71
6	100753044	C3	N	12/28/2016	1/10/2017	3/21/2017	70
7	100695874	C4	N		3/10/2016	5/18/2016	69
8/16/2017							
4:31:19 PM							
8	(Hand filed) C4		N		6/10/2017	8/16/2017	67
42963.688							
0902778							
(Hand							
9	Filed) C3		N	6/5/2017	6/12/2017	8/16/2017	65
10	100737115	C3	N	10/8/2016	10/10/2016	12/9/2016	60
11	100736953	C3	N	10/8/2016	10/10/2016	12/8/2016	59
12	100688170	C3	N	1/20/2016	2/10/2016	4/4/2016	54
13	100736955	C3	N	10/10/2016	10/17/2016	12/8/2016	52
14	100784203	C4	N		7/11/2017	8/30/2017	50
15	100676358	C4	N		12/10/2015	1/28/2016	49
16	100783869	C3	N	7/8/2017	7/10/2017	8/28/2017	49
17	100770515	C4	N		5/10/2017	6/20/2017	41
18	100753045	C4	N		2/10/2017	3/21/2017	39
19	100736957	C3	N	10/30/2016	10/31/2016	12/8/2016	38
20	100695875	C4	N		4/11/2016	5/18/2016	37
42963.688							
0902778							
(Hand							
21	Filed) C3		N	7/8/2017	7/10/2017	8/16/2017	37
22	100784202	C4	N		7/25/2017	8/30/2017	36
23	100752456	C3	N	1/1/2017	2/10/2017	3/12/2017	30
24	100688171	C3	N	2/26/2016	3/10/2016	4/4/2016	25
25	100688172	C3	N	2/13/2016	3/10/2016	4/4/2016	25
26	100789668	C4	N		9/11/2017	10/1/2017	20
27	100676359	C4	N		1/11/2016	1/28/2016	17
28	100714224	C3	N	7/19/2016	7/25/2016	8/4/2016	10
29	100770517	C3	N	5/13/2017	6/10/2017	6/20/2017	10
30	100714219	C4	N		7/26/2016	8/4/2016	9
31	100734938	C4	N		11/1/2016	11/10/2016	9
32	100784200	C3	N	8/15/2017	8/21/2017	8/30/2017	9
33	100695876	C4	N		5/10/2016	5/18/2016	8
34	100708553	C4	N		7/12/2016	7/15/2016	3
35	100729158	C4	N		10/18/2016	10/21/2016	3
36	100675547	C3	Y	12/15/2015	1/11/2016	1/14/2016	3
37	100675548	C3	Y	12/31/2015	1/11/2016	1/14/2016	3
38	100752458	C4	N		3/10/2017	3/12/2017	2
39	100741718	C4	N		1/10/2017	1/12/2017	2