

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Thu, 12 Oct at 10:45 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the Jefferson County Democratic Party 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 Jefferson County Democratic Party 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 Jefferson County Democratic Party 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 Jefferson County Democratic Party 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 Jefferson County Democratic Party 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 timely report Debt

Approximate Cumulative Days Late --	5423			As of -- 10/12/2017		Approx. days late
Violation # Vendor	Date	Amount	Description	Debt that was illegally not reported.		
1 CAPITOL CITY PRESS	2/7/2016	\$ 359.36	PRINT MEMBERSHIP ENVELOPES	This should have been reported as debt on the C4 covering the time period of January 2016.		610
2 JEFFERSON COUNTY FAIR	3/3/2016	\$ 370.00	BOOTH & INSURANCE FOR COUNTY FAIR	This should have been reported as debt on the C4 covering the time period of February 2016.		581
3 CHIMACUM SCHOOL DISTRICT	4/15/2016	\$ 721.50	CUSTODIAL FEES - CAUCUS	This should have been reported as debt on the C4 covering the time period of March 2016.		549
4 CONKLIN CARLA	5/9/2016	\$ 426.10	REIMBURSE FOR CONVENTION PRINTING AT FED EX	This should have been reported as debt on the C4 covering the time period of April 2016.		519
5 D L LOGOS	7/1/2016	\$ 361.60	T-SHIRTS & APRONS	This should have been reported as debt on the C4 covering the time period of May 2016.		489
6 PORT TOWNSEND FOOD CO-OP	7/24/2016	\$ 347.54	SALAD, GREENS, ETC - FISH FEAST	This should have been reported as debt on the 21 day pre-primary C4.		457
7 DENNISON LARRY	7/19/2016	\$ 375.00	BBQ COOKER RENTAL - FISH	This should have been reported as debt on the 21 day pre-primary C4.		457
8 JEFFERSON COUNTY FAIR	7/22/2016	\$ 475.00	ERICKSON BUILDING RENT - FISH FEAST	This should have been reported as debt on the 21 day pre-primary C4.		457
9 RONEY CLAIRE S	7/30/2016	\$ 705.56	FOOD FOR FISH FEAST	This should have been reported as debt on the 7-day pre-primary C4.		443
10 ROGER FIGHT	8/2/2016	\$ 256.20	ADVERTISING - JOINT AD IN PDN	This should have been reported as debt on the 7-day pre-primary C4.		443
11 BROWN & BROWN OF WA	8/12/2016	\$ 694.28	LIABILITY INSURANCE FOR 3 MONTH DEMS HDQ OFFICE	This should have been reported as debt on the 7-day pre-primary C4.		443
12 FIRST BANKCARD	7/28/2016	\$ 1,782.00	PT LEADER ADVERTISING	This should have been reported as debt on the 7-day pre-primary C4.		443
13 FIRST BANKCARD	7/28/2016	\$ 1,181.25	SOCKEYE SALMON FOR FISH FEAST	This should have been reported as debt on the 7-day pre-primary C4.		443
14 MCPHERSON ASSOCIATES	8/9/2016	\$ 1,500.00	3 MONTHS RENT FOR DEMS. HDQ.	This should have been reported as debt on the 7-day pre-primary C4.		443
15 PORT TOWNSEND BREWING CO	7/26/2016	\$ 252.00	BEER & ICE - FISH FEAST	This should have been reported as debt on the 7-day pre-primary C4.		443
16 TUCKER MARY L	8/26/2016	\$ 810.82	YARD SIGNS & CAMPAIGN BUTTONS, ETC.	This should have been reported as debt on the 7-day pre-primary C4.		443
17 TAYLOR SHELLFISH FARMS	7/30/2016	\$ 600.00	VALUE OF DONATED SHELLFISH	This should have been reported as debt on the 7-day pre-primary C4.		443
18 WSDCC	9/30/2016	\$ 375.00	75 CLINTON YARD SIGNS	This should have been reported as debt on the post-primary C4.		395
19 PORT TOWNSEND LEADER	10/17/2016	\$ 3,267.00	ADVERTISING - 3 COLOR ADS	This should have been reported as debt on the post-primary C4.		395
20 ABBOTT-ROE LINDA	9/26/2016	\$ 390.00	PIZZA FOR LOW COST FUNDRAISER	This should have been reported as debt on the post-primary C4.		395
21 ROGER FIGHT	10/23/2016	\$ 320.25	NEWSPAPER AD - PDN	This should have been reported as debt on the 21 day pre-general C4.		359
22 PRINTERY COMMUNICATIONS	10/27/2016	\$ 5,526.12	ELECTION MAILER & POSTAGE	This should have been reported as debt on the 21 day pre-general C4.		359
23 ABBOTT-ROE LINDA	11/10/2016	\$ 282.00	PIZZA FOR ELECTION NIGHT	This should have been reported as debt on the 7 day pre-general C4.		345
24 SERVING OTHERS WORLDWIDE	1/10/2017	\$ 1,000.00	MERCY MISSIONS DENTAL VAN	This should have been reported as debt on the C4 covering the time period of December 2016.		275
25 BROWN & BROWN OF WASHINGTON	3/2/2017	\$ 944.43	2017 ANNUAL LIABILITY POLICY + COVERAGE FOR 2/22/2017 BOARD MEETING	This should have been reported as debt on the C4 covering the time period of February 2017.		216
26 JEFFERSON COUNTY FAIRGROUNDS	4/11/2017	\$ 280.00	2017 JEFFERSON COUNTY FAIR BOOTH RENTAL	This should have been reported as debt on the C4 covering the time period of March 2017.		185
27 WOODWARD MATTHEW	4/27/2017	\$ 445.48	WINE AND BEER FOR PHIL JOHNSON AUCTION	This should have been reported as debt on the C4 covering the time period of March 2017.		185
Total		\$ 24,048.49				

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Violation #	Cumulative Days Late -- Vendor	5182 Date	Amount	Description	As of -- Violation	10/12/2017 Report #	Approx. days late as of today
1	FIRST BANKCARD	11/29/2015	\$ 59.95	COPIES - UPS STORE	Failure to identify number of items printed,	100669737	672
2	WOODRUFF DAVID E	11/8/2015	\$ 149.49	BEVERAGES FOR PORT LUDLOW MEMBERSHIP MEETING	Failure to identify subvendor.	100669737	672
3	CAPITOL CITY PRESS	2/7/2016	\$ 359.36	PRINT MEMBERSHIP ENVELOPES	Failure to identify number of items printed,	100680105	581
4	COWAN BRUCE M	2/19/2016	\$ 66.00	CAUCUS DIRECTION SIGNS	Failure to identify number of items printed,	100680105	581
5	OLYMPIC MAILING SERVICES	2/6/2016	\$ 54.99	MEMBER MAILING	Failure to identify number of items printed,	100680105	581
6	POSTMASTER	2/6/2016	\$ 60.75	MEMBER MAILING	Failure to identify number of items printed,	100680105	581
7	FIRST BANKCARD	4/26/2016	\$ 119.90	PREPAY 2000 COPIES	Failure to identify subvendor.	100694045	519
8	KDCCC	4/1/2016	\$ 160.00	CAMPAIGN BUTTONS	Failure to identify number of items printed,	100694045	519
9	D L LOGOS	7/1/2016	\$ 361.60	T-SHIRTS & APRONS	Failure to identify number of items printed,	100707476	457
10	FIRST BANKCARD	6/25/2016	\$ 146.03	PRINTING - FISH FEAST TICKETS	Failure to identify number of items printed,	100707476	457
11	OLYMPIC MAILING SERVICES	6/20/2016	\$ 66.34	MAILING - FISH FEAST INVITATION	Failure to identify number of items printed,	100707476	457
12	POSTMASTER	6/20/2016	\$ 115.95	MAILING - FISH FEAST INVITATION	Failure to identify number of items printed,	100707476	457
13	DENNISON LARRY	7/19/2016	\$ 375.00	BBQ COOKER RENTAL - FISH	Failure to identify subvendor.	100711641	443
14	WOODRUFF JEANNETTE	7/24/2016	\$ 164.55	WINE FOR FISH FEAST	Failure to identify subvendor.	100711641	443
15	RONEY CLAIRE S	7/30/2016	\$ 705.56	FOOD FOR FISH FEAST	Failure to identify subvendor.	100718342	395
16	RONEY CLAIRE S	7/30/2016	\$ 236.26	EQUIPMENT FOR FISH FEAST	Failure to identify subvendor.	100718342	395
17	TUCKER MARY L	8/26/2016	\$ 810.82	YARD SIGNS & CAMPAIGN BUTTONS, ETC.	Failure to identify number of items printed,	100718342	395
18	ABBOTT-ROE LINDA	9/26/2016	\$ 390.00	PIZZA FOR LOW COST FUNDRAISER	Failure to identify subvendor.	100727595	359
19	FIRST BANKCARD	9/26/2016	\$ 59.95	UPS STORE COPIES	Failure to identify number of items printed,	100727595	359
20	PEDERSEN DEBORAH	9/30/2016	\$ 84.00	BUTTONS, STICKERS, T-SHIRT, ETC	Failure to identify number of items printed,	100727595	359
21	WOODRUFF JEANNETTE	9/9/2016	\$ 91.27	WINE FOR DEMS EVENT	Failure to identify subvendor.	100727595	359
22	PRINTERY COMMUNICATIONS	10/27/2016	\$ 5,526.12	ELECTION MAILER & POSTAGE	Failure to identify number of items printed,	100732382	345
23	WOODWARD MATT	10/23/2016	\$ 217.46	BEVERAGES & SUPPLIES FOR MEET & GREET	Failure to identify subvendor.	100732382	345
24	ABBOTT-ROE LINDA	11/10/2016	\$ 282.00	PIZZA FOR ELECTION NIGHT	Failure to identify subvendor.	100740547	304
25	FIRST BANKCARD	11/25/2016	\$ 182.77	PIZZA	Failure to identify subvendor.	100740547	304
26	FIRST BANKCARD	11/25/2016	\$ 125.91	NAME BADGES	Failure to identify number of items printed,	100740547	304
27	ROE BRIAN	12/7/2016	\$ 72.11	REIMBURSEMENT FOR RENTAL OF CARPET CLEANER FOR HEADQUARTERS	Failure to identify subvendor.	100740548	275
28	UPS STORE	12/8/2016	\$ 59.95	COPIES FOR 12/4/2016 REORG MEETING	Failure to identify number of items printed,	100740548	275
29	WOODWARD MATTHEW	1/14/2017	\$ 53.41	REIMBURSEMENT FOR PURCHASE OF NEW SQUARE READER	Failure to identify subvendor.	100747199	244
30	MC ALLISTER RYAN	2/24/2017	\$ 70.00	REIMBURSEMENT FOR LODGING AT 1/27/2017 WSDCC REORG	Failure to identify subvendor.	100750655	216
31	WOODWARD MATTHEW	2/26/2017	\$ 200.00	REIMBURSEMENT FOR PURCHASE OF HP OFFICEJET 200 PRINTER	Failure to identify subvendor.	100750655	216
32	WOODWARD MATTHEW	4/27/2017	\$ 445.48	WINE AND BEER FOR PHIL JOHNSON AUCTION	Failure to identify subvendor.	100761137	155
33	CHAMBERS LAURI	5/12/2017	\$ 105.13	FOOD AND SUPPLIES FOR AUCTION	Failure to identify subvendor.	100765602	124
34	HACKMAN WILMA	5/1/2017	\$ 167.11	PHIL JOHNSON EVENT	Failure to identify subvendor.	100765602	124
35	HACKMAN WILMA	5/13/2017	\$ 62.72	THANK YOU NOTES AND POSTAGE FOR PHIL JOHNSON AUCTION	Failure to identify subvendor and number of items printed.	100765602	124
36	MC ALLISTER RYAN	5/12/2017	\$ 200.00	REIMBURSEMENT FOR APRIL WSDCC MEETING	Failure to identify subvendor.	100765602	124
37	STROH-STERN BETH	5/1/2017	\$ 217.11	EXPENSES FROM PHIL JOHNSON EVENT	Failure to identify subvendor.	100765602	124
38	GILMORE MARTIN	6/13/2017	\$ 239.00	REIMBURSEMENT FOR LODGING AT APRIL WSDCC MEETING	Failure to identify subvendor.	100774664	93
Total			\$ 12,864.05				

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 360

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100740547	C4	Y		12/12/2016	1/10/2017	29
2	100750658	C3	N	1/9/2017	2/10/2017	3/3/2017	21
3	100750664	C3	N	1/23/2017	2/10/2017	3/3/2017	21
4	100750668	C3	N	1/31/2017	2/10/2017	3/3/2017	21
5	100750656	C3	N	1/3/2017	2/10/2017	3/3/2017	21
6	100750661	C3	N	1/3/2017	2/10/2017	3/3/2017	21
7	100750662	C3	N	1/17/2017	2/10/2017	3/3/2017	21
8	100750657	C3	N	1/6/2017	2/10/2017	3/3/2017	21
9	100750665	C3	N	1/24/2017	2/10/2017	3/3/2017	21
10	100750659	C3	N	1/12/2017	2/10/2017	3/3/2017	21
11	100750666	C3	N	1/25/2017	2/10/2017	3/3/2017	21
12	100750660	C3	N	1/13/2017	2/10/2017	3/3/2017	21
13	100750663	C3	N	1/19/2017	2/10/2017	3/3/2017	21
14	100781981	C4	Y		7/25/2017	8/11/2017	17
15	100782266	C3	N	7/26/2017	7/31/2017	8/14/2017	14
16	100761137	C4	Y		5/10/2017	5/18/2017	8
17	100761132	C3	N	4/24/2017	5/10/2017	5/18/2017	8
18	100774662	C3	N	6/30/2017	7/3/2017	7/11/2017	8
19	100784962	C3	N	8/25/2017	8/28/2017	9/4/2017	7
20	100784966	C3	N	8/25/2017	8/28/2017	9/4/2017	7
21	100779486	C4	N		7/25/2017	7/29/2017	4
22	100760522	C3	N	4/26/2017	5/10/2017	5/13/2017	3
23	100752421	C3	N	2/28/2017	3/10/2017	3/12/2017	2
24	100716004	C3	N	8/11/2016	8/15/2016	8/16/2016	1