

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Wed, 4 Oct at 1:56 AM) via Portal [Meta](#)

To Whom it May Concern --

It has come to my attention that De'Sean Quinn 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, Quinn has failed on numerous occasions to do this.

Please note that these violations are separate from the ones I identified in my previous complaint, and I'm stunned and amazed that these violations are still occurring **despite warning letters from the Public Disclosure Commission**.

Actual Report #	Report Type	Amended Y/N	Deposit Date	Due Date	Date Reported	Days Late
100789357	C4	Y		6/10/2017	9/29/2017	111
100789361	C4	Y		6/10/2017	9/29/2017	111
100789359	C4	N		7/11/2017	9/29/2017	80
100789362	C4	Y		7/11/2017	9/29/2017	80
100789358	C4	N		7/11/2017	9/29/2017	80
100789363	C4	Y		7/25/2017	9/29/2017	66
100789364	C4	Y		9/11/2017	9/29/2017	18
100789360	C4	N		9/11/2017	9/29/2017	18
100788975	C3	N	9/7/2017	9/11/2017	9/25/2017	14
100788974	C3	N	9/15/2017	9/18/2017	9/25/2017	7

2) 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.

a) Quinn illegally failed to break down the following in-kind contribution (technically also an expenditure as defined in **RCW 42.17A.005**):

QUINN DE'SEAN 5/20/2017 \$834.75 G TUKWILA WA 98188 LEGAL SERVICES RELATED TO PDC COMPLIENCE

QUINN DE'SEAN 7/6/2017 \$185.25 G TUKWILA WA 98188 LEGAL SERVICES RELATED TO PDC COMPLIENCE

Quinn must disclose the actual provider of these legal services.

b) Quinn illegally failed to include the quantity of the items ordered from his printer in these expenditures:

OVERNIGHT PRINTING	6/7/2017	\$839.12	SEATTLE	WA	98134	SIGN
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OVERNIGHT PRINTING	5/20/2017	\$207.01	SEATTLE	WA	S
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This is required by **WAC 390-16-037**.

3) Failure to disclose debts. (Violation of RCW 42.17A.235)

It is clear that De'Sean failed to disclose his legal fees as debt on C4s covering proceeding periods. When disclosing this as debt, he should have listed the name of the law firm that provided this service. It is likely that he is avoiding listing the name of the law firm because the law firm is likely the Pacifica Law Group, which also provides services to the city of Tukwila and may present another major ethical conflict of interest for him.

De'Sean also failed to disclose the purchase of newspaper space in the Tukwila Reporter in C4s covering the previous period. (See attached ad).

The PDC should investigate the possibility that De'Sean Quinn 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

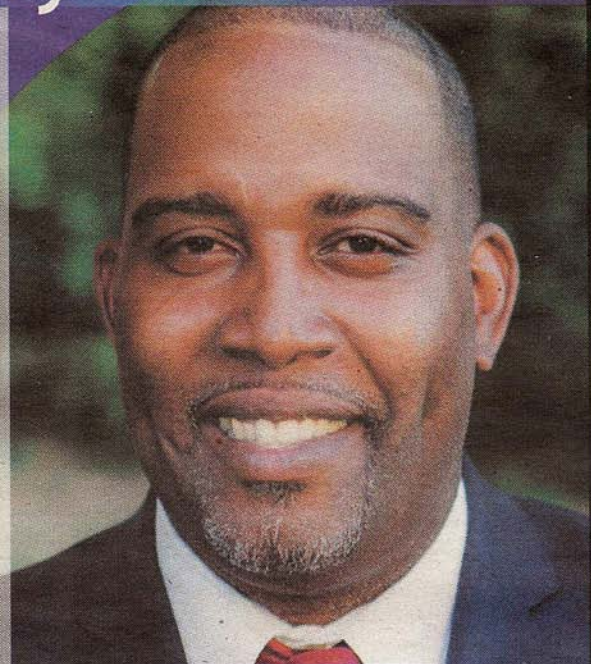
Thank you Tukwila!

Because of your vote, we have been able to make great progress in Tukwila.

Because you put your faith in me, I have:

- Strengthened the city's relationship with our school districts.
- Worked with my fellow council members to pass fiscally responsible budgets.
- Initiated the city's successful COPS grant awarded by the Department of Justice.
- Crafted the 2015 compromise for the city's Comprehensive Plan that protects neighborhoods.

Thank you again, Tukwila. As a father of two, I work hard to make decisions that protect our community and increase the quality of life for all residents. Tukwila is a part of me, it's my home and I love it.



RE-ELECT
**DE'SEAN
QUINN**

for Tukwila City Council Position No. 7

Paid for by People to Elect De'Sean Quinn, 2017
PO BOX 88903 Tukwila, WA 98138