

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Thu, 28 Sep at 8:05 PM) via Portal [Meta](#)
To Whom it May Concern –

It has come to my attention that Laurie Dolan, during her successful 2016 campaign for the state legislature in the 22nd Legislative District has violated an even wider range of provisions of RCW 42.17A than I realized.

1) Failure to timely file C1. (Violation of RCW 42.17A.205)

State law requires that candidates file their C1 statement of organization within 2 weeks of accepting contributions or making expenditures, whichever is sooner.

Dolan reported having received her first contribution of \$100 on 7/16/2015 from Karen Bowen. This gave her until 7/30/2015 to file her C1. Unfortunately, she did not file her C1 until 8/8/2015, **well past the statutory time limit.**

2) Failure to file reports of contributions received and expenditures made prior to filing of C1 on the same day that C1 is filed. (Violation of RCW 42.17A.205)

State law requires that – on the day the C1 is filed – that the candidate or committee file reports containing contributions received or expenditures made prior to registration.

Dolan accepted the following contributions that were not reported until after 8/8/2015, in violation of state law.

BOWEN KAREN	7/16/20 15	\$100. 00	P	OLYM PIA	W A	985 01	WA STATE SENIOR CITIZEN S LOBBY	OFFICE MANAGER
DREW KATHLE EN	8/5/201 5	\$125. 00	P	OLYM PIA	W A	985 16	DEOT OF	ASSIST ANT

							LICENSING	DIRECTOR
DREW STEVEN	8/5/2015	\$125.00	P	OLYMPIA	W	98516	THURSTON COUNTY	ASSESSOR

Unfortunately, these contributions were not reported the day the C1 was filed, which is a clear violation of the statute.

3) Illegal acceptance of donation from a candidate authorized committee. (Violation of RCW 42.17A.405(14))

On or about 7/25/2016, Dolan accepted a contribution of \$800 from “Chris Marr for Senate”. This appears to be leftover secret money from Marr’s campaign when he was defeated for re-election in the state senate in the 6th Legislative District in 2010. Per state law, candidate committees may not contribute to other candidate committees and they may not accept funds from other candidate committees, even when the funds are surplus. To do so is a clear violation of **RCW 42.17A.430 (8)**.

Please note that a separate complaint has been filed against Chris Marr on this matter. It seems that the most satisfactory legal resolution to this illegal action would be for Dolan to refund the \$800 to Marr, and for Marr to establish a surplus funds account and file regular, timely, accurate C3 and C4 reports disclosing his campaign’s activity.

4) Failure to report last minute contributions. (Violation of RCW 42.17A.265)

Laurie Dolan failed to report last minute contributions (@ aggregate of \$1000 or higher) from the following groups within the 48 hour time limit on an LMC or C3 form, as required by law:

a) General Election (21 Days -- 10/18/2016 or later)

10/29/16 received \$1000 from JZ Knight Inc. -- Not reported until 10/31/16

10/31/16 received \$1000 from Judith (JZ) Knight -- Not reported until 11/2/16

10/31/16 received \$1000 from Blue Room Enterprises (JZ Knight owned business) -- Not reported until 11/2/16

5) Failure to list NWP Consulting as a committee officer. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.

Laurie Dolan failed to list **NWP Consulting** as an officer, which is required by **RCW 42.17A.205(2)(c)**. NWP Consulting was the campaign consultant for Dolan's campaign.

I believe that NWP Consulting should have been listed as a committee officer, because NWP Consulting, in conjunction with others, likely made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

WAC 390-05-245 defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any **person** who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee" .

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

6) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1 form. (Violation of RCW 42.17A.425)

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."

Despite performing consulting services (which often includes making expenditures), NWP Consulting was not listed as an officer on Dolan's C1 form.

7) State law requires that campaigns accurately identify the name of a contributor, and prohibits the concealment of the identity of a contributor. RCW 42.17A.435. WAC 390-16-308 (3). State law further requires that accurate reports of contributions be submitted in a timely manner. RCW 42.17A.235. State law also requires that the address of contributors be accurately reported. RCW 42.17A.240. State law also establishes that candidates must return contributions that exceed the contribution limits contained in RCW 42.17A.405 within 10 days of receipt. RCW 42.17A.405, RCW 42.17A.110, WAC 390-16-312.

WAC 390-16-308 (3) establishes that contributions received from a sole proprietor or drawn upon the account of a business which is a sole proprietorship is attributed to the owner of the business entity and reported as such to the PDC.

JZK Inc. is a sole proprietorship owned wholly by JZ Knight (see attached), and as such, this contribution must have been attributed to JZ Knight. JZ Knight is a cult leader who lives in her walled compound in Yelm, WA and claims to channel a 35,000 year old homicidal Lemurian warrior spirit named "Ramtha." Apparently, "Ramtha" has travelled 35,000 years through space and time to help JZ Knight contribute to Laurie Dolan among other political candidates. "Ramtha" also endorsed Donald Trump for President, but JZ Knight claims that when she is not channeling ancient spirit warriors, she only supports Democrats. The State Democratic Party divested itself of JZ Knight funds in 2012 after videos exposing her racist rants against Mexicans, Jews, Catholics and others went public. Some local Thurston County candidates and committees last year were less concerned about the racism than they were about collecting this cult cash.

In October 2016, JZ Knight made two \$1000 contributions - both attributed to the general election cycle - to Laurie Dolan's campaign. One of these was properly attributed to JZ Knight, the other was illegally attributed to JZK Inc.

As such, JZ Knight contributed \$2000 to Dolan for the general election cycle, while the limit for a contribution from an individual for this cycle was only \$1000. This is a clear violation of state law.

Dolan must immediately refund the over-limit contribution from JZ Knight, Inc (really JZ Knight or "Ramtha").

8) Failure to timely submit accurate F1. (Violation of RCW 42.17A.700, .710)

Laurie Dolan failed to submit an accurate F1 containing all the information required by state law.

Dolan became a candidate on or about 7/16/2015, which was when she reported having received her first contribution. She had two weeks (or until 7/30/2015) to file her F1 personal financial affairs statement.

Unfortunately, she did not file this important document until 9/22/2015, well past the statutory deadline.

9) Failure to accurately disclose ownership of a PERS retirement account as an asset. (Violation of RCW 42.17A.700, see WAC 390-24-010)

State law requires that elected officials disclose the assets that they own on their F1 statement, if they are over a certain value. Laurie Dolan failed to report the **value** of her PERS retirement account (on her F1s covering 2015 and 2016), which is an asset per the relevant WACs and RCWs. She appears to have correctly reported the **income**. The value of Dolan's PERS retirement account is almost certainly over \$2400, as Laurie Dolan is a longtime public employee. Laurie Dolan must be required to amend this form to include accurate information.

10) Failure to disclose offices held. (Violation of RCW 42.17A.710(1)(g), see WAC 390-24-010, 150)

State law requires that elected officials disclose the offices that they hold on corporations. Laurie Dolan was/is the President of the Pear Court Homeowners' Association. (See SOS documentation and 2016 voter guide statement.)

Unfortunately, Laurie Dolan failed to report this on both her F1s covering the time period of 2015 and 2016, which is a violation of state law.

The PDC should investigate the possibility that Laurie Dolan committed the above violations maliciously - particularly the effort to hide cult cash, 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

PEAR COURT HOME OWNERS ASSOCIATION SS5755

UBI Number	602011933
Category	REG
Profit/Nonprofit	Nonprofit
Active/Inactive	Active
State Of Incorporation	WA
WA Filing Date	02/07/2000
Expiration Date	02/28/2018
Duration	Perpetual
Registered Agent Information	
Agent Name	LAURIE DOLAN
Address	2914 18TH AVE SE
City	OLYMPIA
State	WA
ZIP	985010000

Governing Persons (as defined in RCW 23.95.105 (12) (<http://app.leg.wa.gov/RCW/supdefault.aspx?cite=23.95.105>))

Title	Name
Governor	Johnston, Stewart
Governor	Dolan, Laurie
Governor	PAINE, CARRIE
Governor	Smitn, Tim

JZK, INC.

UBI Number	601524947
Category	REG
Profit/Nonprofit	Profit
Active/Inactive	Active
State Of Incorporation	WA
WA Filing Date	03/14/1994
Expiration Date	03/31/2018
Duration	Perpetual
Registered Agent Information	
Agent Name	GTH CORPORATE SERVICES, LLC
Address	1201 PACIFIC AVE STE 2100
City	TACOMA
State	WA
ZIP	984020000
Special Address Information	
Address	PO BOX 1157
City	TACOMA
State	WA
Zip	984010000

Governing Persons (as defined in RCW 23.95.105 (12) (<http://app.leg.wa.gov/RCW/supdefault.aspx?cite=23.95.105>))

Title	Name
Governor	KNIGHT , JUDITH

2016 General Election Voters' Guide

Legislative



Laurie Dolan

Elected Experience: Rotary President, Union Leader (Spokane Education Association), President of Pear Ct Homeowners' Association

Other Professional Experience: Manages 750 Acre Family Farm; 30 Years K-12 Education (Classroom Teacher and Administrator); 28 Years Labor/Management Bargaining; 4 Years Policy Director to Governor

Education: BA in English and Education - University of Washington; MA in Special Ed – Gonzaga; PhD in Organizational Leadership - Gonzaga

Community Service: Rotary Club of Olympia (28 year Rotarian); Volunteer Intake Advocate at SideWalk, working with homeless veterans; Board of Directors of Washington Aerospace Scholars; College Bound Scholars; Board Member/Past President of Pear Ct Homeowners' Association; United Way Board of Directors (Spokane)

Statement: A highly respected classroom teacher and administrator, Laurie Dolan is a passionate, progressive leader for the best quality, well funded schools. As Governor Gregoire's Policy Director, Laurie helped create the Department of Early Learning, and crafted important environmental and economic justice legislation. Laurie will be an outspoken activist to fully fund state/local government and public employees, and assure a living wage for all!

A wife, mother, grandmother and cancer survivor, Laurie will fight tirelessly for children and families in the 22nd district. Endorsements: WA State Labor Council, WFSE, WEA, IAM 751, Council 2, NWPC, WA Conservation Voters, Young Democrats

Contact:

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FriendsofLaurieDolan.com

[Who donated to this candidate's campaign?](#)