

# File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Wed, 27 Sep at 11:19 PM) via Portal [Meta](#)

To Whom it May Concern --

It has come to my attention that Manka Dhingra has once again violated provisions of **RCW 42.17A**.

**1) State law specifies limits on the amount of contributions that candidates can receive from certain entities. RCW 42.17A.405. State rule further specifies that ear-marked contribution are applicable to contributions limits for the entity making the ear-marked contribution for the benefit of a given candidate. WAC 390-16-240(2).**

The New Direction PAC has illegally made ear-marked contributions exclusively for the benefit of Manka Dhingra. (See complaint below signature line)

These ear-marked contributions made by the New Direction PAC count against the applicable contribution limits for Dhingra's campaign. New Direction PAC has contributed \$560,000 (funds intended to solely benefit Manka Dhingra) to the Eastside Leadership Council - a committee whose sole purpose is to make independent expenditures promoting Dhingra. These contributions exceed the applicable \$1000/primary, \$1000/general to Dhingra's campaign for a political committee by \$558,000, a significant violation of state law.

**Dhingra must immediately refund \$558,000 of her campaign money to New Direction PAC.**

Please note that Dhingra is already significantly past the 10 day statutory time period for returning this over-limit contribution, which is a separate violation of state law.

**2) 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, Manka Dhingra has failed on numerous occasions to do this.

Report #	Type	Amended	Deposit Date	Due Date (2017)	Date Submitted	Days Late (2017)
100776087	C4	Y		3/10/2017	7/19/2017	131
100776088	C4	Y		4/10/2017	7/19/2017	100
100786170	C3	Y	5/22/2017	6/10/2017	9/11/2017	93
100778710	C3	Y	4/28/2017	5/10/2017	7/25/2017	76
100776089	C4	Y		5/10/2017	7/19/2017	70
100787247	C4	Y		7/11/2017	9/12/2017	63
100788297	C4	Y		7/25/2017	9/19/2017	56
100784762	C3	Y	7/18/2017	7/24/2017	9/4/2017	42
100779464	C3	Y	6/15/2017	6/19/2017	7/28/2017	39

100756660	C3	Y	2/28/2017	3/10/2017	4/17/2017	38
100779264	C3	Y	6/12/2017	6/19/2017	7/27/2017	38
100774054	C3	Y	5/22/2017	6/10/2017	7/10/2017	30
100778923	C3	Y	6/27/2017	7/3/2017	7/26/2017	23
100776193	C3	Y	6/29/2017	7/3/2017	7/20/2017	17
100771386	C3	Y	5/22/2017	6/10/2017	6/26/2017	16
100788469	C3	Y	9/8/2017	9/11/2017	9/22/2017	11
100787607	C3	Y	9/1/2017	9/4/2017	9/14/2017	10
100788298	C4	Y		9/11/2017	9/19/2017	8
100781266	C3	Y	7/24/2017	7/31/2017	8/8/2017	8
100781267	C3	Y	7/28/2017	7/31/2017	8/8/2017	8
100784784	C3	Y	8/24/2017	8/28/2017	9/4/2017	7
100785872	C3	Y	9/1/2017	9/4/2017	9/9/2017	5
100783441	C3	Y	8/18/2017	8/21/2017	8/24/2017	3
100769006	C4	N		6/10/2017	6/12/2017	2
100770457	C3	Y	6/12/2017	6/19/2017	6/20/2017	1

The PDC should investigate the possibility that Manka Dhingra committed the above violations maliciously, if these violations were committed in an effort to evade public scrutiny and campaign finance disclosure, 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

(Referenced complaint below)

To Whom it May Concern --

It has come to my attention that the Eastside Leadership Council, a political committee, has violated provisions of **RCW 42.17A**.

**1) State law requires that committees receiving an earmarked contributions complete a report, entitled "Earmarked Contributions" on a form labeled by the commission as "Special Report E" that identifies the name and address of the person who made the contribution, the candidate or political**

**committee for whose benefit the contribution is earmarked, the amount of the contribution, and the date that the contribution was received; and mail or deliver to the commission and the candidate or political committee benefiting from the contribution a copy of the "Earmarked contributions" report within two working days of receipt of the contribution. RCW 42.17A.270.**

**An earmarked contribution is defined as any contribution (including a pledge per RCW 42.17A.005) given to an intermediary or conduit, either a political committee, candidate or third party, with a designation, instruction, or encumbrance, whether direct or indirect, express or implied, oral or written, which is intended to result in or which does result in all or any part of the contribution being made to or for the promotion of certain candidates, state officials, or ballot propositions. WAC 390-16-240 (1).**

**For purposes of RCW 42.17A.405 and 42.17A.410, an earmarked contribution is deemed to be for the promotion of, and attributable to any limit applicable to the candidate, authorized committee, bona fide political party, caucus of the state legislature or political committee designated by the original contributor. WAC 390-16-240(2) .**

When the Eastside Leadership Council filed their C1PC, it was noted that the PAC was formed with the express purpose of making expenditures in support of Manka Dhingra for State Senate. (See Page 2 of attachment, specifically the box showing "Candidates Supported".)

Thus, it is expressly clear that all contributions received by this committee (which are solely from the New Direction PAC and Kennedy Fund) are earmarked contributions for the sole benefit of Manka Dhingra that must be reported as such. On information and belief, the Committee has collected contributions for Dhingra that have not been disclosed on an earmarked contribution form, in violation of state law.

Additionally, the unreported earmarked contributions received by the Eastside Leadership Council intended for the benefit of Manka Dhingra well exceed the contribution limits that apply to the New Direction PAC, a separate violation of state law, specifically **RCW 42.17A.405**.

New Direction PAC has contributed \$560,000 (funds intended to solely benefit Manka Dhingra) to the Eastside Leadership Council. This exceeds the applicable \$1000/primary, \$1000/general by \$558,000, a significant violation of state law.

The ear-marked contributions coming from the Kennedy Fund may be within limits, due to the fact that that it appears to be registered as a caucus committee, with different applicable contribution limits to Dhingra.

Please note that Kurt Fritts (the sole listed officer of the Eastside Leadership Committee) appears to be well-versed in the requirements of **RCW 42.17A** and **WAC 390**, as he recently submitted a PDC complaint extensively citing those chapters.

The PDC should investigate the possibility this committee committed the above violations maliciously, if these violations were committed in an effort to evade public scrutiny and campaign finance disclosure, 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