

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Wed, 27 Sep at 11:10 PM) via Portal [Meta](#)
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

 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 Toll Free 1-877-601-2828		Political Committee Registration		C1PC (1/12)		100769195 06-12-2017	
Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) EASTSIDE LEADERSHIP COUNCIL				Acronym:		Telephone: 206-682-7328	
Mailing Address P.O. BOX 485				Fax: 202-330-5083			
City KIRKLAND		County KING		Zip + 4 98083		E-mail: JAY@BLUEWAVEPOLITICS.COM	
NEW OR AMENDED REGISTRATION? <input checked="" type="checkbox"/> NEW. Complete entire form. <input type="checkbox"/> AMENDS previous report. Complete entire form.		COMMITTEE STATUS <input type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input checked="" type="checkbox"/> <u>2017</u> election year only. Date of general or special election: <u>11/07/2017</u> (Year)					
1. What is the purpose or description of the committee? <input type="checkbox"/> Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.							
<input type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure:						Ballot Number FOR AGAINST <input type="checkbox"/> <input type="checkbox"/>	
<input type="checkbox"/> Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name:							
For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, identify the party:							
2. Related or affiliated committees. List name, address and relationship. <u>NEW DIRECTION, PARENT, 119 1ST AVENUE SOUTH, SUITE 320, SEATTLE WA 98104</u> <input type="checkbox"/> Continued on attached sheet.							
3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.) If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options. <input type="checkbox"/> MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor.							
<input checked="" type="checkbox"/> FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.						Telephone Number: 206-682-7328	
4. Campaign Manager's or Media Contact's Name and Address KURT FRITTS P.O. BOX 485, KIRKLAND WA 98083							
5. Treasurer's Name and Address. Does treasurer perform <u>only</u> ministerial functions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> . See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. JAY PETERSON 119 1ST AVENUE SOUTH, SUITE 320, SEATTLE WA 98104				<input type="checkbox"/> Continued on attached sheet. Daytime Telephone Number: 206-682-7328			
6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. <input type="checkbox"/> Continued on attached sheet.							
7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." <input type="checkbox"/> Continued on attached sheet. KURT FRITTS, CAMPAIGN MANAGER/DIRECTOR, P.O. BOX 485, KIRKLAND WA 98083							
8. Campaign Bank or Depository BANK OF AMERICA		Branch DEXTER HORTON		City SEATTLE			
9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address. Street Address, Room Number, City where campaign books will be available for inspection 119 1ST AVENUE SOUTH, SUITE 320, SEATTLE In order to make an appointment, contact the campaign at (telephone, fax, e-mail): 206-682-7328 202-330-5083 JAY@BLUEWAVEPOLITICS.COM							
10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters. <input checked="" type="checkbox"/> A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.				11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge. <div style="display: flex; justify-content: space-between;"> <div> Committee Treasurer's Signature JAY PETERSON </div> <div> Date 06-12-2017 </div> </div>			

Attachment to C1PC – Candidates Supported

Name EASTSIDE LEADERSHIP COUNCIL

Candidate	Office	Party
Manka Dhingra	Senate LD 45	Democrat