

## File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Tue, 26 Sep at 11:42 PM) via Portal Meta  
To Whom it May Concern --

It has come to my attention that Pedro Olguin has, once again, 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, Pedro Olguin 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.

Pedro Olguin illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

### **3) Failure to report in-kind contribution. (Violation of RCW 42.17A.235)**

Olguin failed to report his filing fee as an in-kind contribution to his campaign. He must amend his May C4 to rectify this issue immediately.

In fact, Attorney General Slade Gorton rendered an official AG opinion on this exact matter in 1974, when he wrote, in part:

"In simplest terms, this payment (in those cases in which it is required) is a necessary part of the candidate's financial outlay if he is to have his name appear on the ballot and, in that manner, become eligible to be elected to the office he is seeking. Moreover, the payment is very clearly a transfer of something of value and it cannot be doubted that it is for the purpose of assisting the candidate and furthering his election campaign. Payment of the filing fee is thus precisely within the broad definition of "expenditure" as set forth above." -- **AGO 1974 No. 16 - July 29, 1974**

The PDC should investigate the possibility that Pedro Olguin 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 A -- Illegally Late filed C3 and C4 reports

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100776529	C4	N		5/10/2017	7/23/2017	74
2	100775219	C3	Y	4/27/2017	5/10/2017	7/15/2017	66
3	100776494	C3	N	6/1/2017	6/5/2017	7/23/2017	48
4	100776530	C4	N		6/10/2017	7/23/2017	43
5	100776493	C3	N	5/18/2017	6/10/2017	7/23/2017	43
6	100776492	C3	N	5/11/2017	6/10/2017	7/23/2017	43
7	100776495	C3	N	6/8/2017	6/12/2017	7/23/2017	41
8	100775225	C3	N	5/27/2017	6/10/2017	7/15/2017	35
9	100776496	C3	N	6/29/2017	7/3/2017	7/23/2017	20
10	100776532	C3	N	6/28/2017	7/3/2017	7/23/2017	20
11	100776497	C3	N	7/6/2017	7/10/2017	7/23/2017	13
12	100776531	C4	N		7/11/2017	7/23/2017	12
13	100775221	C3	Y	6/28/2017	7/3/2017	7/15/2017	12
14	100776498	C3	N	7/13/2017	7/17/2017	7/23/2017	6
15	100775220	C3	Y	7/6/2017	7/10/2017	7/15/2017	5
<b>Total Cumulative Days late (so far)</b>							<b>481</b>

<b>Exhibit B -- Illegal failure to timely report Debt</b>						
<b>Violation #</b>	<b>Vendor</b>	<b>Date</b>	<b>Amount</b>	<b>Description</b>	<b>Debt that was illegally not reported.</b>	<b>Days late</b>
1	OVERNIGHT PRINTING	7/13/2017	\$726.04	MAILING	This should have been reported as debt on the 21 day pre-primary C4	77
2	USPS	7/13/2017	\$510.53	POSTAGE	This should have been reported as debt on the 21 day pre-primary C4	77
3	SOUTH GATE MASON HALL	7/12/2017	\$1,150.00	HALL RENTAL	This should have been reported as debt on the 21 day pre-primary C4	77
					<b>Total Cumulative Days Late (so far)</b>	<b>231</b>
		<b>Total</b>	<b>\$2,386.57</b>			