

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Thu, 21 Sep at 2:09 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the 11th District Democrats 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, the 11th District Democrats has failed on numerous occasions to do this.

Many of these instances were covered by my previous complaint against this committee (See PDC Tracking #22308 - linked here: <https://www.pdc.wa.gov/browse/cases/22308>)

On information and belief, there are new instances of late or non-reporting by the 11th District Democrats, including the fact that they have failed to file their 9/11/2017 C4, as required by state law. They have also apparently failed to file any C3s since 9/4/2017.

2) Failure to designate a treasurer after resignation. (Violation of RCW 42.17A.210(3)(b))

State law requires that political committees – in the event of the resignation of their treasurer – designate and file with the commission the name and address of their new treasurer. Having a treasurer is not option, as per **RCW 42.17A.205**.

Effective 9/5/2017, 11th District Democrats Treasurer Rob Howard resigned his position with the committee and the committee failed to appoint a replacement treasurer. *See attachment.*

The committee had 6 days (starting on 8/31/2017 when Howard notified them of his decision to step down) to designate a replacement, but failed to do so. They must do so immediately. This failure has already impeded their ability to file current reports.

I will note that there are numerous options for hiring a professional treasurer outside of the 11th District Democrats organization. For instance, Jason Bennett, Phillip Lloyd, and Josie Olson are all professional treasurers who might be willing to perform treasurer services for the 11th District Democrats. Jason Bennett appears to be the most experienced of these treasurers in responding to PDC complaints and aiding substantially out of compliance political committees.

Bennett has also provided treasurer services to other LD organizations, such as the 36th LDDemocrats: https://www.pdc.wa.gov/sites/default/files/compliance_case_files/22753%2036th%20District%20Democrats%20Response.pdf.

It is particularly disturbing that this committee would continue to blatantly violate the Washington State campaign finance laws while they are still under investigation by both the PDC and the AG's office for previous historic violations. It is also shocking that these violations continue despite the frequent communication and assistance provided to this Legislative District and other Democratic Party affiliated committees by the Washington State Democratic Party including legal, accounting, and financial assistance.

The PDC should investigate the possibility that the 11th District Democrats 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

11th LD Democrats Treasurer Resignation

Rahoward reported 6 minutes ago (Thu, 7 Sep at 1:50 PM) via Email

To: pdc@pdc.wa.gov

Cc: dflaetwood@legionworlds.net

Please be advised that I am no longer the treasurer for the 11th LD Democrats (11THDD-126). I rendered my resignation to the board on 8/31 effective 9/5/2017. There is currently no replacement treasurer.

I attempted to file an amended C1PC through ORCA, but since there is no treasurer, it throws an error. When I called the PDC earlier today, Scott advised me that I should send an email to this address in absence of being able to file an updated report.

Regards,

Robert A. Howard