

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Mon, 18 Sep at 10:12 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the Snohomish County Democratic Central Committee has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**.

This notice and the attached spreadsheet detail numerous apparent violations of various provisions of Washington's campaign finance law by the Snohomish County Democratic Central Committee. The Snohomish County Democratic Central Committee has apparently violated **RCW 42.17A** as follows:

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 Snohomish County Democratic Central Committee has failed on numerous occasions to do this. (See **Exhibits A - "Illegally Late filed C3 and C4 reports"**).

Cumulative total for reports past statutory deadline is 1134 days late.

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.

the Snohomish County Democratic Central Committee illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

Cumulative total for reports that did not properly report debt is 6672 days late and counting.

3) Failure to properly break down expenditures. (Violation of RCW 42.17A.235, see WAC 390-16-205)

State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee and reported as such. In accordance with **WAC 390-16-037**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

The Snohomish County Democratic Central Committee illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

Cumulative total for reports that did not properly breakdown expenditures is 1801 days late and counting.

The PDC should investigate the possibility that the Snohomish County Democratic Central Committee 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	100675252	C4	Y		7/14/2015	1/11/2016	181
2	100787193	C3	N	7/25/2017	7/31/2017	9/12/2017	43
3	100787218	C3	N	7/28/2017	7/31/2017	9/12/2017	43
4	100787196	C3	N	7/28/2017	7/31/2017	9/12/2017	43
5	100787194	C3	N	7/26/2017	7/31/2017	9/12/2017	43
6	100787217	C3	N	7/27/2017	7/31/2017	9/12/2017	43
7	100787195	C3	N	7/27/2017	7/31/2017	9/12/2017	43
8	100787200	C3	N	8/3/2017	8/7/2017	9/12/2017	36
9	100787201	C3	N	8/4/2017	8/7/2017	9/12/2017	36
10	100787197	C3	N	7/31/2017	8/7/2017	9/12/2017	36
11	100787198	C3	N	8/1/2017	8/7/2017	9/12/2017	36
12	100787221	C3	N	7/31/2017	8/7/2017	9/12/2017	36
13	100787199	C3	N	8/2/2017	8/7/2017	9/12/2017	36
14	100768695	C3	N	4/30/2017	5/10/2017	6/12/2017	33
15	100759530	C4	Y		4/10/2017	5/10/2017	30
16	100787204	C3	N	8/10/2017	8/14/2017	9/12/2017	29
17	100787202	C3	N	8/8/2017	8/14/2017	9/12/2017	29
18	100787203	C3	N	8/9/2017	8/14/2017	9/12/2017	29
19	100787207	C3	N	8/17/2017	8/21/2017	9/12/2017	22
20	100787206	C3	N	8/16/2017	8/21/2017	9/12/2017	22
21	100787205	C3	N	8/14/2017	8/21/2017	9/12/2017	22
22	100787208	C3	N	8/18/2017	8/21/2017	9/12/2017	22
23	100787209	C3	N	8/22/2017	8/28/2017	9/12/2017	15
24	100787210	C3	N	8/23/2017	8/28/2017	9/12/2017	15
25	100787219	C3	N	8/25/2017	8/28/2017	9/12/2017	15
26	100787212	C3	N	8/25/2017	8/28/2017	9/12/2017	15
27	100787211	C3	N	8/24/2017	8/28/2017	9/12/2017	15
28	100722862	C4	Y		9/12/2016	9/26/2016	14
29	100757164	C3	N	3/16/2017	4/10/2017	4/23/2017	13
30	100757165	C3	Y	3/16/2017	4/10/2017	4/23/2017	13
31	100757166	C3	Y	3/16/2017	4/10/2017	4/23/2017	13

32	100787222	C3	N	8/28/2017	9/4/2017	9/12/2017	8
33	100787214	C3	N	8/30/2017	9/4/2017	9/12/2017	8
34	100787215	C3	N	8/31/2017	9/4/2017	9/12/2017	8
35	100787216	C3	N	9/1/2017	9/4/2017	9/12/2017	8
36	100787213	C3	N	8/29/2017	9/4/2017	9/12/2017	8
37	100787223	C3	N	8/29/2017	9/4/2017	9/12/2017	8
38	100730416	C4	Y		10/18/2016	10/25/2016	7
39	100725563	C3	N	10/1/2016	10/3/2016	10/10/2016	7
40	100768692	C3	N	6/3/2017	6/5/2017	6/12/2017	7
41	100768694	C3	N	6/1/2017	6/5/2017	6/12/2017	7
42	100734128	C4	N		11/1/2016	11/6/2016	5
43	100768661	C4	N		6/10/2017	6/12/2017	2
44	100768650	C3	N	5/23/2017	6/10/2017	6/12/2017	2
45	100768654	C3	N	5/16/2017	6/10/2017	6/12/2017	2
46	100768658	C3	N	5/4/2017	6/10/2017	6/12/2017	2
47	100768656	C3	N	5/12/2017	6/10/2017	6/12/2017	2
48	100768651	C3	N	5/22/2017	6/10/2017	6/12/2017	2
49	100768648	C3	N	5/25/2017	6/10/2017	6/12/2017	2
50	100768657	C3	N	5/11/2017	6/10/2017	6/12/2017	2
51	100768652	C3	N	5/19/2017	6/10/2017	6/12/2017	2
52	100768649	C3	N	5/24/2017	6/10/2017	6/12/2017	2
53	100768659	C3	N	5/29/2017	6/10/2017	6/12/2017	2
54	100768646	C3	N	5/28/2017	6/10/2017	6/12/2017	2
55	100768647	C3	N	5/26/2017	6/10/2017	6/12/2017	2
56	100768655	C3	N	5/15/2017	6/10/2017	6/12/2017	2
57	100650149	C4	N		7/28/2015	7/29/2015	1
58	100711801	C4	N		7/26/2016	7/27/2016	1
59	100787327	C4	Y		9/11/2017	9/12/2017	1
60	100654660	C3	N	8/30/2015	8/31/2015	9/1/2015	1
						Approx. Cumulative Days Late	1134

Exhibit B -- Illegal failure to timely report Debt

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late	
1	ATC SERVICE SOLUTIONS	10/26/2015	\$880.00	PHONE SERVICES	This should have been reported as debt on the 21 day pre-general C4.	706	10/27/2015
2	ATC SERVICE SOLUTIONS	10/31/2015	\$407.00	PROFESSIONAL SERVICES	This should have been reported as debt on the 7 day pre-general C4.	692	12/10/2015
3	ETBA	12/24/2015	\$519.75	OFFICE RENT	This should have been reported as debt on the C4 covering the time period of November 2015.	648	1/11/2016
4	ETBA	1/22/2016	\$1,039.50	OFFICE RENT	This should have been reported as debt on the C4 covering the time period of December 2015.	616	2/10/2016
5	FRONTIER COMMUNICATIONS	1/21/2016	\$258.28	OFFICE PHONE	This should have been reported as debt on the C4 covering the time period of December 2015.		2/10/2016
6	ETBA	3/18/2016	\$519.75	RENT	This should have been reported as debt on the C4 covering the time period of February 2016.	557	4/11/2016
7	ETBA	4/22/2016	\$519.75	RENT	This should have been reported as debt on the C4 covering the time period of March 2016.	525	5/11/2016
8	EVERETT PUBLIC SCHOOLS	4/13/2016	\$648.00	RENTAL FEES	This should have been reported as debt on the C4 covering the time period of March 2016.		5/11/2016
9	ETBA	4/7/2016	\$519.75	RENT	This should have been reported as debt on the C4 covering the time period of March 2016.		5/11/2016
10	EVERETT PUBLIC SCHOOLS	5/13/2016	\$309.31	ROOM RENTAL	This should have been reported as debt on the C4 covering the time period of April 2016.	495	6/10/2016
11	FEDEX OFFICE	5/2/2016	\$1,240.74	PRINTING	This should have been reported as debt on the C4 covering the time period of April 2016.		6/10/2016
12	EVERGREEN STATE FAIR	7/7/2016	\$2,975.00	BOOTH FEE	This should have been reported as debt on the C4 covering the time period of May 2016.	465	7/12/2016
13	ETBA	6/30/2016	\$750.00	RENT	This should have been reported as debt on the C4 covering the time period of May 2016.		7/12/2016
14	ETBA	6/10/2016	\$750.00	RENT	This should have been reported as debt on the C4 covering the time period of May 2016.		7/12/2016
15	MAX HOBBS POLITICAL MEMORABILIA	8/30/2016	\$366.50	BOOTH MATERIALS	This should have been reported as debt on the 7-day pre-primary C4.	419	9/12/2016
16	ETBA	7/30/2016	\$519.75	OFFICE RENT	This should have been reported as debt on the 7-day pre-primary C4.		9/12/2016
17	MAX HOBBS POLITICAL MEMORABILIA	7/28/2016	\$629.93	BOOTH MATERIALS	This should have been reported as debt on the 7-day pre-primary C4.		9/12/2016
18	ETBA	10/12/2016	\$1,618.50	RENT	This should have been reported as debt on the post-primary C4.	371	10/18/2016
19	SNOHOMISH COUNTY PUD	10/7/2016	\$390.00	ROOM RENTAL	This should have been reported as debt on the post-primary C4.		10/18/2016
20	EDMONDS COMMUNITY COLLEGE	10/5/2016	\$800.00	EVENT DEPOSIT	This should have been reported as debt on the post-primary C4.		10/18/2016
21	ETBA	9/23/2016	\$519.75	RENT	This should have been reported as debt on the post-primary C4.		10/18/2016
22	USPS	11/29/2016	\$345.00	POSTAGE	This should have been reported as debt on the 7 day pre-general C4.	321	12/12/2016
23	EDMONDS COMMUNITY COLLEGE	11/17/2016	\$7,167.74	CATERING	This should have been reported as debt on the 7 day pre-general C4.		12/12/2016
24	AMERICAN TECHNOLOGY SERVICES	11/7/2016	\$270.00	PHONE SERVICES	This should have been reported as debt on the 7 day pre-general C4.		12/12/2016
25	ETBA	12/31/2016	\$519.75	OFFICE RENT	This should have been reported as debt on the C4 covering the time period of November 2016.	280	1/10/2017
26	FEDEX OFFICE	12/19/2016	\$480.92	PRINTING	This should have been reported as debt on the C4 covering the time period of November 2016.		1/10/2017
27	SNOHOMISH COUNTY PUD	12/10/2016	\$490.00	ROOM RENTAL	This should have been reported as debt on the C4 covering the time period of November 2016.		1/10/2017
28	ETBA	12/1/2016	\$519.75	OFFICE RENT	This should have been reported as debt on the C4 covering the time period of November 2016.		1/10/2017
29	EVERETT TRADES BUILDING ASSOCIATION	3/22/2017	\$519.75	EVERETT TRADES BUILDING ASSOCIATION,RENT	This should have been reported as debt on the C4 covering the time period of February 2017.	192	4/10/2017
30	FRONTIER COMMUNICATIONS	3/10/2017	\$390.46	FRONTIER COMMUNICATIONS,PHONE AND INTERNET	This should have been reported as debt on the C4 covering the time period of February 2017.		4/10/2017
31	TRADE PRINTERY	3/9/2017	\$316.51	TRADE PRINTERY,REMIT	This should have been reported as debt on the C4 covering the time period of February 2017.		4/10/2017
32	EVERETT TRADES BUILDING ASSOCIATION	4/20/2017	\$519.75	RENT	This should have been reported as debt on the C4 covering the time period of March 2017.	161	5/10/2017
33	TURNER'S WORLD ENTERPRISES LLC	6/27/2017	\$3,500.00	SPEAKING FEE	This should have been reported as debt on the C4 covering the time period of May 2017.	100	7/11/2017
34	EVERETT TRADES BUILDING ASSOCIATION	6/22/2017	\$519.75	MONTHLY RENT	This should have been reported as debt on the C4 covering the time period of May 2017.		7/11/2017
35	FRONTIER COMMUNICATIONS	6/16/2017	\$395.43	PHONE AND INTERNET	This should have been reported as debt on the C4 covering the time period of May 2017.		7/11/2017
36	SNOHOMISH COUNTY EVERGREEN STATE	7/13/2017	\$3,075.00	SNOHOMISH COUNTY EVERGREEN STATE FAIR,BOOTH RENTAL AT EVERGREEN STATE FAIR	This should have been reported as debt on the 21 day pre-primary C4.	69	7/25/2017
37	TULALIP RESORT CASINO	8/30/2017	\$8,000.00	CATERING AND SPACE RENTAL FOR GALA	This should have been reported as debt on the 7-day pre-primary C4.	55	9/11/2017
38	OVERNIGHT PRINTING	8/24/2017	\$266.11	GALA PROGRAMS AND PLACARDS	This should have been reported as debt on the 7-day pre-primary C4.		9/11/2017
39	LIBERTY MUTUAL INSURANCE	8/21/2017	\$260.00	INSURANCE	This should have been reported as debt on the 7-day pre-primary C4.		9/11/2017
40	EVERETT TRADES BUILDING ASSOCIATION	8/10/2017	\$519.75	OFFICE RENT	This should have been reported as debt on the 7-day pre-primary C4.		9/11/2017
41	DELTA AIRLINES	8/4/2017	\$677.80	PLANE TICKET FOR NINA TURNER	This should have been reported as debt on the 7-day pre-primary C4.		9/11/2017
					Approx. Cumulative Days Late	6672	
		Total	\$44,934.73				

Exhibit C -- Illegal Failure to breakdown expenditures.

Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	LEWIS LAURA	7/2/2015	558.85	CATERING	Failure to identify subvendor.	100675252	770
2	AMAZING MAIL	6/3/2015	239.19	MAILING	Failure to identify subvendor.	100675252	801
3	HARRIS VICTOR	3/16/2017	29.47	VICTOR HA	Failure to identify subvendor.	100759530	161
5	MCGUINNES DIANA	6/5/2017	231.95	PARTY SUP	Failure to identify subvendor.	100774655	69
Approx. Cumulative Days Late							1801