

## **File a Formal Complaint - Glen Morgan**

[Glenmorgan89](#) reported 10 days ago (Sat, 9 Sep at 2:52 AM) via Portal [Meta](#)  
To Whom it May Concern --

It has come to my attention that Rep. Beth Doglio from the 22nd Legislative District 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, Rep. Beth Doglio has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late deposits and contributions" and Exhibit B "Illegally late reported expenditures/in-kind contributions/debts"**).

### **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. 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.

Rep. Beth Doglio illegally failed to report the following debts: (See **Exhibit C - "Illegal failure to timely report debts"**).

### **3) Failure to properly break down expenses. (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. 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.

Rep. Beth Doglio illegally failed to break down the following expenses.  
(See Exhibit D - "Illegal failure to break down expenditures")

**4) Illegal donation of campaign funds to candidate/political committees (Violation of RCW 42.17A.430(8)).**

State law prohibits candidates from donating their campaign funds to other candidate/political committees, with a handful of narrow exemptions.

Unfortunately, Doglio made numerous expenditures to candidate/political committees that exceed the fair market value of the items his campaign received, thus incurring an illegal contribution (as defined in **RCW 42.17A.005**) to these committees.

Please see below as evidence of illegal expenditures/donations:

THURSTON COUNTY DEMOCRATS	2016-05-07	1580	KENNEDY DINNER SPONSORSHIP
WASHINGTON STATE DEMOCRATS	2016-06-10	132.24	CONVENTION DINNER TICKETS

**5) Illegal personal use of campaign money. (Violation of RCW 42.17A.445)**

State law prohibits the personal use of campaign funds.

Doglio reported having purchased a computer from Best Buy on 11/10/2015.

Despite the fact that the 2016 campaign is over, the laptop is still property (surplus) of the Doglio campaign.

On information and belief, Doglio is using this computer for purposes unrelated to the campaign. This includes both personal and legislative use.

Doglio must immediately issue a personal refund to her campaign for the value of the computer.

The PDC should investigate the possibility that Rep. Beth Doglio 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 D -- Illegal Failure to breakdown expenditures.

Violation #	Vendor	Date	Amount	Description	Violation
1	DOGLIO BETH	2016-08-04	\$ 40,000.00	TRANSFER TO SURPLUS FUNDS ACCOUNT	Failure to identify subvendor.
2	DOGLIO BETH	2016-06-16	\$ 454.74	FILING FEE REIMBURSEMENT	Failure to identify subvendor.
3	DOGLIO BETH	2016-10-14	\$ 146.05	REIMBURSEMENT - TONER	Failure to identify subvendor.
4	DOGLIO BETH	2016-06-07	\$ 82.78	FOOD REIMBURSEMENT	Failure to identify subvendor.
5	DOGLIO BETH	2016-04-29	\$ 49.00	POSTAGE REIMBURSEMENT	Failure to identify subvendor.
6	DOGLIO BETH	2016-08-15	\$ 25.50	REIMBURSEMENT	Failure to identify subvendor.
7	WILSON SHEILA	2016-06-07	\$ 210.30	FOOD REIMBURSEMENT	Failure to identify subvendor.
		<b>Total</b>	<b>\$ 40,968.37</b>		

## Exhibit C -- Illegal failure to timely report Debt

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
1	DOGLIO BETH	11/10/2015	\$1,165.98	BEST BUY - COMPUTER	This should have been reported as debt on th
2	WESTBROOK DANIELLE	11/19/2015	\$1,500.00	CONSULTING FEE	This should have been reported as debt on th
3	WESTBROOK DANIELLE	11/20/2015	\$477.79	CAPITOL CITY PRESS - REMIT ENVELOPES	This should have been reported as debt on th
4	WOMAN'S CLUB OF OLYMPIA	11/27/2015	\$510.00	EVENT SPACE RENTAL & DEPOSIT	This should have been reported as debt on th
5	KARIUKI MCGEE MERCY	1/8/2016	\$600.00	MUSIC	This should have been reported as debt on th
6	PERCIVAL CONSULTING GROUP	2/2/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
7	CAPITAL CITY PRESS	2/13/2016	\$522.24	STICKERS	This should have been reported as debt on th
8	PERCIVAL CONSULTING GROUP	3/1/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
9	ETHIX VENTURES	3/9/2016	\$510.24	UNION/AMERICAN MADE RUNNING T-SHIRTS	This should have been reported as debt on th
10	WINPOWER STRATEGIES	3/20/2016	\$1,000.00	WEBSITE	This should have been reported as debt on th
11	JOHNSON ALI MARIE	3/31/2016	\$400.00	VOLUNTEER COORDINATION	This should have been reported as debt on th
12	PERCIVAL CONSULTING GROUP	4/1/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
13	WINPOWER STRATEGIES	4/5/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
14	SUSTAINABLE SOUTH SOUND	4/19/2016	\$550.00	LOCALIST ADVERTISEMENT	This should have been reported as debt on th
15	PERCIVAL CONSULTING GROUP	5/2/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
16	THURSTON COUNTY DEMOCRATS	5/7/2016	\$1,580.00	KENNEDY DINNER SPONSORSHIP	This should have been reported as debt on th
17	TEACHOUT EMILY	5/26/2016	\$300.00	MUSIC FOR 0519 EVENT	This should have been reported as debt on th
18	PERCIVAL CONSULTING GROUP	5/29/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
19	WINPOWER STRATEGIES	6/16/2016	\$9,100.00	CONSULTING/DESIGN FEES	This should have been reported as debt on th
20	HANDS ON CHILDRENS MUSEUM	6/16/2016	\$1,050.00	HOCM RENTAL FEE	This should have been reported as debt on th
21	THURSTON COUNTY DEMOCRATS	6/30/2016	\$856.80	NEWSLETTER AD	This should have been reported as debt on th
22	SUSTAINABLE SOUTH SOUND	6/30/2016	\$300.00	BUY LOCAL AD	This should have been reported as debt on th
23	WESTBROOK DANIELLE	7/5/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
24	WESTBROOK DANIELLE	8/27/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
25	WESTBROOK DANIELLE	10/1/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
26	WAGNITZ ISACC	10/12/2016	\$360.00	CAMPAIGN INTERN	This should have been reported as debt on th
27	CAPITAL CITY PRESS	10/17/2016	\$1,691.63	MAILING POSTAGE	This should have been reported as debt on th
28	MALUCHNIK ALLISON	11/3/2016	\$1,834.00	CONSULTING FEE	This should have been reported as debt on th
29	WESTBROOK DANIELLE	11/5/2016	\$1,000.00	CONSULTING FEE	This should have been reported as debt on th
30	WESTBROOK DANIELLE	11/5/2016	\$2,504.71	CAPITOL CITY PRESS REIMBURSEMENT - PRINTING	This should have been reported as debt on th
31	HUNT HILLARY	12/5/2016	\$600.00	CONSULTING FEE	This should have been reported as debt on th
32	WESTBROOK DANIELLE	12/6/2016	\$3,500.00	WIN BONUS	This should have been reported as debt on th
33	WESTBROOK DANIELLE	12/6/2016	\$1,000.00	CAMPAIGN CONSULTING	This should have been reported as debt on th
<b>Total</b>			<b>\$41,913.39</b>		

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## Exhibit A -- Illegally Late Reported/Deposited Contributions

Violation #	Contribution_date	Deposit Date	rs Late	Dep C3 Due Date	Date Reported	rs Late Repo	Amount	Contributor
1	4/18/2016	4/18/2016	0	5/11/2016	7/18/2016	68	\$250.00	MCCOY CATHERINE
2	4/18/2016	4/18/2016	0	5/11/2016	7/18/2016	68	\$100.00	RIVERA CELIA
3	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$100.00	REICHLIN SALLY
4	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$100.00	SCAVEZZE BARB
5	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$250.00	COX KATHY
6	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$100.00	STRUB RHENDA
7	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$100.00	RAINEY TOM
8	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$100.00	MOORE HEATHER
9	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$150.00	WHITE TUDOR KATE
10	10/14/2015	10/14/2015	0	10/19/2015	10/28/2015	9	\$250.00	STRASBERG HARRIET
11	10/30/2015	10/30/2015	0	11/2/2015	11/7/2015	5	\$100.00	ROBINSON JOELLE
12	10/30/2015	10/30/2015	0	11/2/2015	11/7/2015	5	\$200.00	LANGER STEPHEN
13	10/30/2015	10/30/2015	0	11/2/2015	11/7/2015	5	\$100.00	ANTONELLI MILDRED
14	10/30/2015	10/30/2015	0	11/2/2015	11/7/2015	5	\$100.00	WILLIAMS-DERRY CLARK
15	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$35.00	ANONYMOUS CONTRIBUTIONS
16	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$20.00	SAYLORS DESI
17	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$20.00	HAWKINS CHRIS
18	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	DUNKELMAN MAXINE
19	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	HEDRICK WANDA
20	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$30.00	OLIVA TOM
21	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$20.00	SWARTHOUT EILEEN
22	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$20.00	ELLIOTT CORY
23	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$30.00	FRANK JULIE
24	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$40.00	FOX RUSS
25	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$10.00	REINER LISA
26	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$40.00	KMET PETE
27	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$200.00	HALLSTROM STEVE
28	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$100.00	LAWRENCE ANTHEA
29	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	HEDRICK SUSAN
30	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	VESTAL LOLA
31	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	PETERS ALISON
32	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	HOLLAR JUDY
33	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	HORN ROGER
34	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	LANTOR JUDY
35	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$100.00	SACKRISON GRAEME
36	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$20.00	ORDEL LINDA
37	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$20.00	GRUNBAUM ARTHUR
38	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	TELNECK LEE
39	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$50.00	TELNECK JENNIFER
40	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	MCMANUS ANNIE
41	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	O'NEILL HUGH
42	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	JACOBS BONNIE
43	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	JACOBS BOB
44	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	SCAVEZZE BARB
45	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	GARST CHRISTINE
46	6/4/2016	6/4/2016	0	6/6/2016	6/9/2016	3	\$25.00	BRUTON PEGGY
47	10/13/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$100.00	LEVINE AUDREY
48	10/14/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$100.00	HILL MAUREEN
49	10/15/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$950.00	DOGLIO JOE
50	10/15/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$100.00	BRUTON PEGGY
51	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$100.00	DE PLACE ERIC
52	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$950.00	ROWE FINKBEINER KRISTIN
53	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$50.00	KILMER PAT
54	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$100.00	ANDREWS LINDA
55	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$100.00	HOFFMAN ERIKA
56	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$50.00	MACGREGOR JEAN
57	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$250.00	QUIGLEY EILEEN
58	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$50.00	COLE ROB
59	10/16/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$250.00	MACFARLANE ROSS
60	10/17/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$100.00	GARST CHRISTINE

61	10/17/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$150.00	BOYLES KRISTEN
62	10/17/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$25.00	DANVER SUE
63	10/17/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$300.00	HOWELL DOUG
64	10/18/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$200.00	MACLEAN LISA
65	10/19/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$50.00	LARSON KIMBERLY
66	10/19/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$100.00	PONZIO REBECCA
67	10/19/2015	10/20/2015	0	10/26/2015	10/28/2015	2	\$50.00	ALLEN JENNIFER
68	10/19/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$250.00	MITCHELL BILL
69	10/19/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$200.00	SMITH RICHARD
70	10/20/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$250.00	PETRICH ELIZABETH
71	10/21/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$50.00	STEEGE THEODORE
72	10/21/2015	10/22/2015	0	10/26/2015	10/28/2015	2	\$150.00	MYERS TERESA

**Total      \$8,355.00**

## Exhibit B --Illegally Late Reported Expenditures/In-Kind Contributions/Debts

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
1	3/1/2016	4/11/2016	12/10/2016	243	PERCIVAL CONSULTING GROUP	\$1,000.00	CONSULTING FEE
2	3/9/2016	4/11/2016	12/10/2016	243	ETHIX VENTURES	\$510.24	UNION/AMERICAN MADE RUNNING T-SHIRTS
3	3/11/2016	4/11/2016	12/10/2016	243	LCB	\$64.00	EVENT LICENSE
4	3/12/2016	4/11/2016	12/10/2016	243	JOHNSON ALI MARIE	\$97.40	VOLUNTEER COORDINATION
5	3/20/2016	4/11/2016	12/10/2016	243	WINPOWER STRATEGIES	\$1,000.00	WEBSITE
6	3/23/2016	4/11/2016	12/10/2016	243	TURNER JESSIE	\$75.00	REFUND CONTRIBUTION - MADE IN ERROR
7	3/25/2016	4/11/2016	12/10/2016	243	WESTBROOK DANIELLE	\$100.00	JESIKA WESTBROOK, DATA MANAGEMENT
8	3/31/2016	4/11/2016	12/10/2016	243	STRIPE	\$41.86	MARCH CREDIT CARD FEES
9	3/31/2016	4/11/2016	12/10/2016	243	FACEBOOK	\$2.49	FACEBOOK AD
10	3/31/2016	4/11/2016	12/10/2016	243	JOHNSON ALI MARIE	\$400.00	VOLUNTEER COORDINATION
11	4/1/2016	5/11/2016	12/10/2016	213	PERCIVAL CONSULTING GROUP	\$1,000.00	CONSULTING FEE
12	4/4/2016	5/11/2016	12/10/2016	213	WESTBROOK DANIELLE	\$68.75	MILEAGE
13	4/5/2016	5/11/2016	12/10/2016	213	WINPOWER STRATEGIES	\$1,000.00	CONSULTING FEE
14	4/5/2016	5/11/2016	12/10/2016	213	CAPITAL CITY PRESS	\$234.84	BUSINESS CARDS
15	4/5/2016	5/11/2016	12/10/2016	213	USPS	\$4.90	STAMPS
16	4/8/2016	5/11/2016	12/10/2016	213	CAPITAL CITY PRIDE	\$50.00	PRIDE PARADE REGISTRATION FEE
17	4/9/2016	5/11/2016	12/10/2016	213	SAFEWAY	\$32.21	VOLUNTEER FOOD
18	4/10/2016	5/11/2016	12/10/2016	213	TWISTER DONUTS	\$10.99	VOLUNTEER FOOD
19	4/10/2016	5/11/2016	12/10/2016	213	FEDEX OFFICE	\$14.04	PLACARDS
20	4/10/2016	5/11/2016	12/10/2016	213	HANDS ON CHILDRENS MUSEUM	\$200.00	VENUE DEPOSIT
21	4/19/2016	5/11/2016	12/10/2016	213	SUSTAINABLE SOUTH SOUND	\$550.00	LOCALIST ADVERTISEMENT
22	4/29/2016	5/11/2016	12/10/2016	213	TAGS	\$11.42	REPLACEMENT NAME BADGE
23	4/29/2016	5/11/2016	12/10/2016	213	DOGLIO BETH	\$49.00	POSTAGE REIMBURSEMENT
24	4/30/2016	5/11/2016	12/10/2016	213	STRIPE	\$70.97	APRIL CREDIT CARD FEES
25	4/24/2016	5/11/2016	12/10/2016	213	DOGLIO BETH	\$10.00	WCV INTERVIEW - PARKING
26	11/10/2015	12/10/2015	1/11/2016	32	DOGLIO BETH	\$174.07	BEST BUY - COMPUTER TECH SUPPORT
27	11/10/2015	12/10/2015	1/11/2016	32	DOGLIO BETH	\$20.40	BARNES & NOBLE - THANK YOU CARDS
28	11/10/2015	12/10/2015	1/11/2016	32	DOGLIO BETH	\$1,165.98	BEST BUY - COMPUTER
29	11/10/2015	12/10/2015	1/11/2016	32	DOGLIO BETH	\$130.00	USPS - PO BOX
30	11/10/2015	12/10/2015	1/11/2016	32	DOGLIO BETH	\$35.00	USPS - STAMPS
31	11/10/2015	12/10/2015	1/11/2016	32	DOGLIO BETH	\$36.87	ORCA BOOKS - THANK YOU CARDS
32	11/10/2015	12/10/2015	1/11/2016	32	DOGLIO BETH	\$49.00	USPS STAMPS
33	11/10/2015	12/10/2015	1/11/2016	32	STRIPE	\$196.10	111015 CREDIT CARD TRANSACTION FEES
34	11/19/2015	12/10/2015	1/11/2016	32	WESTBROOK DANIELLE	\$1,500.00	CONSULTING FEE
35	11/20/2015	12/10/2015	1/11/2016	32	WESTBROOK DANIELLE	\$34.77	OFFICE DEPOT - ENVELOPES
36	11/20/2015	12/10/2015	1/11/2016	32	WESTBROOK DANIELLE	\$477.79	CAPITOL CITY PRESS - REMIT ENVELOPES
37	11/27/2015	12/10/2015	1/11/2016	32	MAILBOX OF OLYMPIA	\$24.50	STAMPS
38	11/27/2015	12/10/2015	1/11/2016	32	WOMAN'S CLUB OF OLYMPIA	\$510.00	EVENT SPACE RENTAL & DEPOSIT
39	11/30/2015	12/10/2015	1/11/2016	32	STRIPE	\$58.42	NOV CREDIT CARD TRANSACTION FEELS
40	10/14/2015	10/27/2015	11/10/2015	14	TWIN STAR CREDIT UNION	\$25.00	SAVINGS DEPOSIT (TO OPEN ACCOUNT)
41	10/21/2015	10/27/2015	11/10/2015	14	TWIN STAR CREDIT UNION	\$23.57	CHECKS
<b>Total</b>						<b>\$11,059.58</b>	