

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported 10 days ago (Sat, 9 Sep at 12:07 AM) via Portal Meta

To Whom it May Concern --

It has come to my attention that Marcus Riccelli, a legislature from the 3rd 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, Marcus Riccelli 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.

Marcus Riccelli 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.

Marcus Riccelli illegally failed to break down the following expenses. (See **Exhibit D - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that Marcus Riccelli 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 PREFERRED LABOR SIGN ASSOCIATION	2016-08-20	\$ 1,250.74	YARD SIGNS	Failure to identify sub
2 RICCELLI MARCUS M	2016-05-31	\$ 446.32	MAY TRAVEL AND MEALS: REIMBURSE RICCELLI	Failure to identify sub
3 RICCELLI MARCUS M	2016-11-19	\$ 260.52	PHONE AND INTERNET EXPENSE	Failure to identify sub
4 RICCELLI MARCUS M	2016-08-15	\$ 260.52	REIMBURSEMENT FOR USE OF PHONE AND INTERNET FOR CAMPAIGN PURPOSES	Failure to identify sub
5 RICCELLI MARCUS M	2015-08-05	\$ 211.28	TELEPHONE EXPENSE (JANUARY - JUNE 2015)	Failure to identify sub
6 RICCELLI MARCUS M	2015-10-05	\$ 140.85	REIMBURSE: TELEPHONE AND WEB CONNECTIVITY	Failure to identify sub
7 RICCELLI MARCUS M	2015-10-05	\$ 77.44	REIMBURSE: TRAVEL AND MEALS	Failure to identify sub
8 RICCELLI MARCUS M	2015-12-15	\$ 70.42	REIMBURSE TELEPHONE NOV	Failure to identify sub
9 RICCELLI MARCUS M	2015-08-05	\$ 50.76	TRAVEL	Failure to identify sub
10 SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE	2016-10-03	\$ 1,000.00	OFFICE RENT	Failure to identify sub
11 SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE	2016-06-10	\$ 250.00	RENT	Failure to identify sub
12 SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE	2016-12-22	\$ 125.00	RENT	Failure to identify sub
13 SQUARE PEG MEDIA	2016-10-04	\$ 275.00	MEDIA	Failure to identify sub
	Total	\$ 4,418.85		

Exhibit C -- Illegal Failure to timely report Debt

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
1	MARNEY B	1/7/2015	\$600.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the C4 covering the time period of December 2014.
2	ALASKA AIF	12/8/2015	\$410.20	TRAVEL TO SEATTLE	This should have been reported as debt on the C4 covering the time period of November 2015.
3	MARNEY B	12/10/2015	\$300.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the C4 covering the time period of November 2015.
4	PHOTOS BY	12/30/2015	\$334.08	ANNUAL POSTCARD MAILING	This should have been reported as debt on the C4 covering the time period of November 2015.
5	UNITED ST	1/8/2016	\$343.00	POSTAGE FOR POSTCARD MAILING - 1500 POSTCARDS	This should have been reported as debt on the C4 covering the time period of November 2015.
6	WILLIAMS I	1/10/2016	\$500.00	COMMUNICATIONS AND MESSAGING CONSULTING	This should have been reported as debt on the C4 covering the time period of December 2015.
7	WILLIAMS I	3/16/2016	\$1,000.00	MICHAELA WILLIAMS, COMMUNICATIONS CONSULTING	This should have been reported as debt on the C4 covering the time period of February 2016.
8	ALASKA AIF	3/22/2016	\$441.20	TRAVEL	This should have been reported as debt on the C4 covering the time period of February 2016.
9	THIRD DIST	4/1/2016	\$1,250.00	ADVERTISEMENT IN CAUCUS PROGRAM	This should have been reported as debt on the C4 covering the time period of March 2016.
10	BEST BUY #	4/1/2016	\$1,032.64	COMPUTER	This should have been reported as debt on the C4 covering the time period of March 2016.
11	SPOKANE C	4/21/2016	\$650.00	ADVERTISEMENT IN PROGRAM	This should have been reported as debt on the C4 covering the time period of March 2016.
12	WILLIAMS I	4/22/2016	\$500.00	MICHAELA WILLIAMS, COMMUNICATIONS AND MESSAGING CONSULTING	This should have been reported as debt on the C4 covering the time period of March 2016.
13	MARNEY B	4/30/2016	\$350.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the C4 covering the time period of March 2016.
14	ALASKA AIF	5/13/2016	\$300.20	TRAVEL - OLYMPIA ROUND TRIP	This should have been reported as debt on the C4 covering the time period of April 2016.
15	CORBIN SEI	5/16/2016	\$300.00	SPACE RENTAL FOR EVENT	This should have been reported as debt on the C4 covering the time period of April 2016.
16	MARNEY B	5/27/2016	\$300.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the C4 covering the time period of April 2016.
17	WILLIAMS I	5/27/2016	\$500.00	COMMUNICATIONS CONSULTING	This should have been reported as debt on the C4 covering the time period of April 2016.
18	RICCELLI M	5/31/2016	\$446.32	MAY TRAVEL AND MEALS: REIMBURSE RICCELLI	This should have been reported as debt on the C4 covering the time period of April 2016.
19	PAPERMILL	6/6/2016	\$260.88	PRINTING	This should have been reported as debt on the C4 covering the time period of May 2016.
20	SENIOR FR	6/7/2016	\$797.31	FOOD AND SETUP FOR EVENT	This should have been reported as debt on the C4 covering the time period of May 2016.
21	SPOKANE C	6/10/2016	\$500.00	ADVERTISING AND SPONSORSHIP FOR EVENT	This should have been reported as debt on the C4 covering the time period of May 2016.
22	QUARTER R	6/13/2016	\$475.00	BAND SERVICES FOR EVENT	This should have been reported as debt on the C4 covering the time period of May 2016.
23	MARNEY B	6/30/2016	\$350.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the C4 covering the time period of May 2016.
24	FLEMING J	7/1/2016	\$560.00	CAMPAIGN COORDINATION	This should have been reported as debt on the C4 covering the time period of May 2016.
25	PAYPAL - O	7/1/2016	\$260.87	CARD PROCESSING FEES	This should have been reported as debt on the C4 covering the time period of May 2016.
26	FLEMING J	7/15/2016	\$600.00	CAMPAIGN COORDINATION	This should have been reported as debt on the 21 day pre-primary C4.
27	ALASKA AIF	7/25/2016	\$306.20	TRAVEL - SEATTLE/SPOKANE	This should have been reported as debt on the 21 day pre-primary C4.
28	MARNEY B	7/30/2016	\$350.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the 7-day pre-primary C4.
29	MARNEY B	8/2/2016	\$350.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the 7-day pre-primary C4.
30	RICCELLI M	8/15/2016	\$260.52	REIMBURSEMENT FOR USE OF PHONE AND INTERNET FOR CAMPAIGN PURPOSES	This should have been reported as debt on the 7-day pre-primary C4.
31	WILLIAMS I	8/16/2016	\$350.00	WEB REVIEW AND UPDATE	This should have been reported as debt on the 7-day pre-primary C4.
32	PREFERREC	8/20/2016	\$1,250.74	YARD SIGNS	This should have been reported as debt on the 7-day pre-primary C4.
33	BORDERLIN	8/31/2016	\$342.41	T-SHIRTS	This should have been reported as debt on the 7-day pre-primary C4.
34	ALASKA AIF	9/13/2016	\$262.20	TRAVEL	This should have been reported as debt on the post-primary C4.
35	MARNEY B	9/22/2016	\$350.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the post-primary C4.
36	SPOKANE C	10/3/2016	\$1,000.00	OFFICE RENT	This should have been reported as debt on the post-primary C4.
37	ALASKA AIF	10/3/2016	\$325.20	TRAVEL	This should have been reported as debt on the post-primary C4.
38	SQUARE PE	10/4/2016	\$275.00	MEDIA	This should have been reported as debt on the post-primary C4.
39	BORDERLIN	10/8/2016	\$326.10	T-SHIRTS	This should have been reported as debt on the post-primary C4.
40	MARNEY B	10/13/2016	\$350.00	PUBLIC DISCLOSURE FILING	This should have been reported as debt on the post-primary C4.
41	THE PACIFI	10/17/2016	\$750.00	PRINT AD	This should have been reported as debt on the post-primary C4.
42	LAMAR ME	10/27/2016	\$1,000.00	BILLBOARDS	This should have been reported as debt on the 21 day pre-general C4.
43	THE PACIFI	10/28/2016	\$750.00	PRINT AD	This should have been reported as debt on the 21 day pre-general C4.
44	SPOKANE C	11/17/2016	\$1,000.00	ELECTION NIGHT	This should have been reported as debt on the 7 day pre-general C4.
45	RICCELLI M	11/19/2016	\$260.52	PHONE AND INTERNET EXPENSE	This should have been reported as debt on the 7 day pre-general C4.
46	MARNEY B	11/27/2016	\$350.00	PUBLIC DISCLOSURE REPORTING	This should have been reported as debt on the 7 day pre-general C4.
47	MARNEY B	12/22/2016	\$700.00	PUBLIC DISCLOSURE REPORTS	This should have been reported as debt on the C4 covering the time period of November 2016.
48	UNITED ST	12/22/2016	\$376.00	POSTAGE	This should have been reported as debt on the C4 covering the time period of November 2016.
49	RICCELLI M	2/1/2017	\$287.29	TRAVEL	This should have been reported as debt on the C4 covering the time period of January 2017.
50	SPOKANE C	3/21/2017	\$1,000.00	FOR AD PLACEMENT AT LEGACY DINNER MARCH 2017	This should have been reported as debt on the C4 covering the time period of February 2017.
51	RICCELLI M	6/3/2017	\$316.32	TELEPHONE REIMBURSEMENT DEC 2016 - MAY 2017	This should have been reported as debt on the C4 covering the time period of May 2017.
Total			\$26,250.20		

Exhibit A -- Illegally Late Reported/Deposited Contributions

Violation #	Contribution_date	Deposit Date	Is Late Dep	C3 Due Date	Date Reported	Late Repd	Amount	Contributor
1	9/30/2015	10/1/2015	0	10/5/2015	11/9/2015	35	\$500.00	PACIFIC MERCHANTS SHIPPING ASSOCIATION
2	9/30/2015	10/1/2015	0	10/5/2015	11/9/2015	35	\$950.00	WASHINGTON PHYSICAL THERAPY PAC
3	6/2/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$19.00	GRAHAM IAN
4	6/2/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$19.00	GRAHAM REBECCA K
5	6/2/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$1,000.00	WASHINGTON PHYSICAL THERAPY PAC
6	6/2/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	WASHINGTON PHYSICAL THERAPY PAC
7	6/2/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$150.00	SIDDOWAY DOUGLAS
8	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	FASSETT SHARON
9	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	HEMINGWAY TOM
10	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	FASSETT WILLIAM
11	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	HOROBIOWSKI RHONDA
12	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	HOROBIOWSKI TED
13	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$38.00	BARDEN JED
14	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$500.00	MARR CHRIS
15	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	JOHNSON TOM
16	6/3/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	GREEN DAVID D
17	6/4/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	STUCKY ERIC
18	6/4/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$76.00	PRATT-LOWE ELISSA
19	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$500.00	PAWN 1 INC
20	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$500.00	PAWN 1 INC
21	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	BIERY NANCY
22	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	ARMSTRONG EVAN
23	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	SONG SAM
24	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	KAACZMAREK POLLY
25	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$75.00	GILBERT DAVID
26	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$35.00	NOWAKOWSKI ALISON
27	6/6/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$100.00	LAUGEN MARILYN
28	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	DI RE EUGENE
29	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$12.50	PELLICCIOTTI M BETH
30	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$12.50	PELLICCIOTTI JOSEPH M
31	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	BACON SHARI K
32	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	BACON MICHAEL E
33	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$75.00	MAZUREK-MCCOWAN COLLEEN M
34	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$75.00	MCCOWAN CHRISTOPHER R
35	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$19.00	ROSKELLEY JOYCE B
36	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$19.00	ROSKELLEY JOHN F
37	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	HOROBIOWSKI CAPRICE MARIE
38	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	HOROBIOWSKI JEFF J
39	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$125.00	RICCELLI GRETCHEN
40	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$38.00	FLEMING JOANNE M
41	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$200.00	BROWN LISA JO
42	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$500.00	SPOKANE TRIBE OF INDIANS
43	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	PILEGGI THOMAS
44	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	BAKER JANICE E
45	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	WALLSTEIN ADAM J
46	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	MCGIRK CAROL L
47	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	RAPP MICHAEL
48	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$20.00	TIEKEN JAMES
49	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	MICHAEL K DEROSIER OD & JEREMY K MARCUSON OD
50	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$1,000.00	UNITED FOOD & COMMERCIAL WORKERS UNION LOCAL 1439
51	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$1,000.00	UNITED FOOD & COMMERCIAL WORKERS UNION LOCAL 1439
52	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$1,000.00	CREDIT UNION LEGISLATIVE ACTION FUND
53	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$1,000.00	CREDIT UNION LEGISLATIVE ACTION FUND
54	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$1,000.00	SPOKANE TEACHERS CREDIT UNION
55	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	ROWE HAL
56	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$250.00	DAY CHIROPRACTIC CLINIC PS
57	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$38.00	WINSTON KAREN
58	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	SULLIVAN CONNIE
59	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$12.50	CASTROLANG ANDREA M
60	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$12.50	CASTROLANG JAMES A
61	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	ORMSBY KIMBERLY
62	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$50.00	ORMSBY TIMOTHY
63	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	FISHBURN KAREN I
64	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	FISHBURN ROBERT J
65	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$15.00	SCHNEIDER PAUL H
66	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$15.00	SCHNEIDER KATRINA H
67	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$19.00	WALTON JAIME
68	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$19.00	WALTON MICHAEL
69	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$12.50	GILL RICHARD
70	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$12.50	GILL LORILEE
71	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$25.00	SCHAEFER BEVERLY J
72	6/7/2016	6/8/2016	0	6/13/2016	6/20/2016	7	\$37.50	GLASS ALISSA

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

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Ur Amount	Description	Report #
1	6/2/2014	7/15/2014	9/8/2014	55	MAILCHIM \$50.00	ELECTRONIC NEWSLETTER	100600040
2	6/2/2014	7/15/2014	9/8/2014	55	ARISTOTLE \$150.00	DATA MANAGEMENT	100600040
3	6/3/2014	7/15/2014	9/8/2014	55	SENROR FRC \$600.00	KICKOFF FOOD	100600040
4	6/9/2014	7/15/2014	9/8/2014	55	MIDDLE CC \$750.00	WEB DESIGN AND DEVELOPMENT	100600040
5	6/11/2014	7/15/2014	9/8/2014	55	CASTROLAI \$250.00	CAMPAIGN CONSULTING AND ADMINISTRATION	100600040
6	6/16/2014	7/15/2014	9/8/2014	55	ARISTOTLE \$150.00	DATA MANAGEMENT	100600040
7	7/1/2014	7/15/2014	9/8/2014	55	MAILCHIM \$50.00	ELECTRONIC NEWSLETTER	100600040
8	10/21/2014	10/28/2014	12/8/2014	41	ARISTOTLE \$150.00	DATA MANGEMENT	100615344
9	6/1/2015	7/14/2015	8/11/2015	28	EXPENSES I \$100.00		100652676
10	1/4/2017	2/10/2017	3/10/2017	28	MAIL CHIM \$60.00	SOCIAL MEDIA PORTAL	100751967
11	3/1/2015	4/10/2015	5/6/2015	26	EXPENSES I \$100.00		100635060
12	4/22/2014	5/12/2014	6/5/2014	24	ARISTOTLE \$150.00	DATA MANAGEMENT SERVICES	100582156
13	4/24/2014	5/12/2014	6/5/2014	24	MIDDLE CC \$750.00	WEB DESIGN	100582156
14	10/14/2015	10/27/2015	11/9/2015	13	STARBUCK \$75.00	COFFE SERVICE FOR GROUP	100667495
15	7/18/2014	7/29/2014	7/30/2014	1	ARISTOTLE \$150.00	DATA MANAGEMENT	100593990
16	7/24/2014	7/29/2014	7/30/2014	1	NORTHWE \$600.00	DESIGN SERVICES	100593990

Total \$4,135.00