

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported a day ago (Sun, 17 Sep at 11:13 PM) via Portal Meta To Whom it May Concern --

It has come to my attention that Rep. Laurie Dolan from the 22nd Legislative District 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 Rep. Laurie Dolan. **The cumulative days late for the apparently untimely reporting included in this notice is approximately 10089 days as of today.** Rep. Laurie Dolan 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, Rep. Laurie Dolan 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 342 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.

Rep. Laurie Dolan 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 6439 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.

Rep. Laurie Dolan 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 3721 days late and counting.

The PDC should investigate the possibility that Rep. Laurie Dolan 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	100739014	C4	Y		4/11/2016	12/23/2016	256
2	100736328	C4	Y		10/18/2016	12/3/2016	46
3	100659137	C4	N		9/10/2015	10/1/2015	21
4	100657357	C3	N	8/6/2015	9/10/2015	9/17/2015	7
5	100787550	C3	Y	8/16/2017	9/10/2017	9/14/2017	4
6	100787551	C3	N	8/29/2017	9/10/2017	9/14/2017	4
7	100734902	C3	N	11/3/2016	11/7/2016	11/9/2016	2
8	100716779	C3	N	8/17/2016	8/22/2016	8/23/2016	1
9	100716780	C3	N	8/18/2016	8/22/2016	8/23/2016	1
Approx. Cumulative Days L							342

Exhibit B -- Illegal failure to timely report Debt						
Violation#	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	CAPITOL CITY PRESS	10/5/2015	\$1,409.88	LETTER, EPS & REMIT EPS	This should have been reported as debt on the C4 covering the time period of September 2015.	708
2	MALUCHNIK ALLISON	1/1/2016	\$357.50	CONSULTING	This should have been reported as debt on the C4 covering the time period of December 2015.	615
3	NWP CONSULTING	2/17/2016	\$1,016.45	PRINTING	This should have been reported as debt on the C4 covering the time period of January 2016.	585
4	NWP CONSULTING	2/17/2016	\$550.00	DESIGN	This should have been reported as debt on the C4 covering the time period of January 2016.	
5	MALUCHNIK ALLISON	2/1/2016	\$550.00	CONSULTING	This should have been reported as debt on the C4 covering the time period of January 2016.	
6	CAPITOL CITY PRESS	2/2/2016	\$266.00	BUSINESS CARDS	This should have been reported as debt on the C4 covering the time period of January 2016.	
7	MALUCHNIK ALLISON	3/2/2016	\$962.50	CONSULTING	This should have been reported as debt on the C4 covering the time period of February 2016.	556
8	MALUCHNIK ALLISON	3/30/2016	\$1,705.00	CONSULTANT	This should have been reported as debt on the C4 covering the time period of February 2016.	
9	THOMPSON SIGN SHOP	3/31/2016	\$309.80	STICKERS	This should have been reported as debt on the C4 covering the time period of February 2016.	
10	THURSTON COUNTY DEMOCRATS	4/9/2016	\$734.40	NEWSLETTER ADS	This should have been reported as debt on the C4 covering the time period of March 2016.	524
11	NWP CONSULTING	4/5/2016	\$2,500.00	CONSULTING	This should have been reported as debt on the C4 covering the time period of March 2016.	
12	MALUCHNIK ALLISON	5/2/2016	\$2,365.00	CONSULTING	This should have been reported as debt on the C4 covering the time period of April 2016.	494
13	THOMPSON SIGN SHOP	5/5/2016	\$2,504.70	YARD SIGNS	This should have been reported as debt on the C4 covering the time period of April 2016.	
14	MALUCHNIK ALLISON	5/31/2016	\$2,750.00	CONSULTING	This should have been reported as debt on the C4 covering the time period of April 2016.	
15	SUSTAINABLE SOUTH SOUND - BUY LOC	5/31/2016	\$500.00	AD	This should have been reported as debt on the C4 covering the time period of April 2016.	
16	MALUCHNIK ALLISON	7/1/2016	\$2,750.00	CONSULTATION	This should have been reported as debt on the C4 covering the time period of May 2016.	464
17	THURSTON COUNTY DEMOCRATS	7/3/2016	\$367.20	AD	This should have been reported as debt on the C4 covering the time period of May 2016.	
18	NWP CONSULTING	6/2/2016	\$2,500.00	CONSULTING RETAINER	This should have been reported as debt on the C4 covering the time period of May 2016.	
19	SENIOR NEWS	6/12/2016	\$380.00	AD	This should have been reported as debt on the C4 covering the time period of May 2016.	
20	NWP CONSULTING	7/2/2016	\$1,016.44	PRINTING	This should have been reported as debt on the C4 covering the time period of May 2016.	
21	PUBLISHERS MAILING SERVICE	7/12/2016	\$5,252.01	POSTAGE AND MAILING SERVICE	This should have been reported as debt on the 21 day pre-primary C4.	432
22	PUBLISHERS MAILING SERVICE	7/21/2016	\$4,645.80	POSTAGE AND MAILING SERVICE	This should have been reported as debt on the 21 day pre-primary C4.	
23	NWP CONSULTING	7/20/2016	\$5,698.77	MAIL PIECE	This should have been reported as debt on the 21 day pre-primary C4.	
24	NWP CONSULTING	7/22/2016	\$4,368.21	PRINTING	This should have been reported as debt on the 21 day pre-primary C4.	
25	NWP CONSULTING	8/5/2016	\$5,128.86	PRINTING	This should have been reported as debt on the 7-day pre-primary C4.	418
26	WAGNITZ ISAAC	8/4/2016	\$380.00	LITERATURE DISTRIBUTOR	This should have been reported as debt on the 7-day pre-primary C4.	
27	PUBLISHERS MAILING SERVICE	7/27/2016	\$5,325.39	POSTAGE AND MAILING SERVICE	This should have been reported as debt on the 7-day pre-primary C4.	
28	MALUCHNIK ALLISON	8/1/2016	\$2,750.00	CONSULTING	This should have been reported as debt on the 7-day pre-primary C4.	
29	TUFTS CHRISTOPHER	8/4/2016	\$320.00	LITERATURE DISTRIBUTOR	This should have been reported as debt on the 7-day pre-primary C4.	
30	MALUCHNIK ALLISON	9/1/2016	\$2,750.00	CONSULTING	This should have been reported as debt on the post-primary C4.	370
31	MALUCHNIK ALLISON	9/12/2016	\$1,000.00	CONSULTING	This should have been reported as debt on the post-primary C4.	
32	MALUCHNIK ALLISON	9/30/2016	\$916.00	CONSULTING	This should have been reported as debt on the post-primary C4.	
33	CAPITOL CITY PRESS	10/17/2016	\$1,691.64	POSTAGE	This should have been reported as debt on the post-primary C4.	
34	CAPITOL CITY PRESS	10/20/2016	\$2,504.71	PRINTING AND MAILING SERVICE	This should have been reported as debt on the 21 day pre-general C4.	334
35	HUNT HILLARY	10/31/2016	\$600.00	CONSULTING	This should have been reported as debt on the 21 day pre-general C4.	
36	DOLAN LAURIE	10/26/2016	\$2,500.00	LOAN REPAYMENT	This should have been reported as debt on the 21 day pre-general C4.	
37	THURSTON COUNTY DEMOCRATS	10/31/2016	\$367.20	AD	This should have been reported as debt on the 21 day pre-general C4.	
38	MALUCHNIK ALLISON	10/31/2016	\$916.00	CONSULTING	This should have been reported as debt on the 21 day pre-general C4.	
39	QUALITY SELF STORAGE	11/1/2016	\$730.00	STORAGE	This should have been reported as debt on the 7 day pre-general C4.	320
40	MALUCHNIK ALLISON	11/8/2016	\$1,000.00	CONSULTING	This should have been reported as debt on the 7 day pre-general C4.	
41	NWP CONSULTING	11/15/2016	\$4,000.00	BONUS	This should have been reported as debt on the 7 day pre-general C4.	
42	CARRICK JAMES	11/15/2016	\$1,000.00	BONUS	This should have been reported as debt on the 7 day pre-general C4.	
43	MALUCHNIK ALLISON	11/22/2016	\$1,485.00	CONSULTING	This should have been reported as debt on the 7 day pre-general C4.	
44	WAGNITZ ISAAC	11/8/2016	\$360.00	LITERATURE DISTRIBUTOR	This should have been reported as debt on the 7 day pre-general C4.	
45	TRAPP STEVE	11/16/2016	\$500.00	BONUS	This should have been reported as debt on the 7 day pre-general C4.	
46	PAINO KITTY	12/21/2016	\$500.00	BOUUS	This should have been reported as debt on the C4 covering the time period of November 2016.	279
47	CAPITOL CITY PRESS	1/3/2017	\$317.70	PRINTING	This should have been reported as debt on the C4 covering the time period of December 2016.	250

Total Dollars \$82,502.16

Approx. Cumulative Days Late

6349

Exhibit C -- Illegal Failure to breakdown expenditures.

Violatic Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1 CARRICK JAMES	9/17/2015	\$ 59.29	INK	Failure to identify subvendor.	100659135	708
2 CARRICK JAMES	9/17/2015	\$ 167.35	PAPER, ENVELOPES, INK	Failure to identify subvendor.	100659135	
3 NWP CONSULTING	2/17/2016	\$ 1,016.45	PRINTING	Failure to identify subvendor.	100683851	556
4 NWP CONSULTING	4/26/2016	\$ 75.00	NEWSLETTER AD	Failure to identify subvendor.	100692457	494
5 DOLAN LAURIE	5/19/2016	\$ 244.91	PRINTER, INK & PAPER	Failure to identify subvendor.	100698029	464
6 NWP CONSULTING	7/2/2016	\$ 1,016.44	PRINTING	Failure to identify subvendor.	100707465	432
7 NWP CONSULTING	7/20/2016	\$ 5,698.77	MAIL PIECE	Failure to identify subvendor.	100711101	418
8 NWP CONSULTING	7/22/2016	\$ 4,368.21	PRINTING	Failure to identify subvendor.	100711101	
9 NWP CONSULTING	8/5/2016	\$ 5,128.86	PRINTING	Failure to identify subvendor.	100718018	370
10 WESTBROOK DANIELLE	11/8/2016	\$ 100.00	FOOD FOR PARTY	Failure to identify subvendor.	100736327	279
					Approx. Cumulative Days	3721