

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

[Glenmorgan89](#) reported 10 days ago (Fri, 8 Sep at 11:45 PM) via Portal [Meta](#)  
To Whom it May Concern --

It has come to my attention that Senator Dean Takko (19th Legislative District) has 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, Dean Takko 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.

Dean Takko illegally failed to report the following debts: (See **Exhibit C - "Illegal failure to timely report debt"**).

### **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.

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

The PDC should investigate the possibility that Dean Takko 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	
1	TAKKO DEAN A	2016-08-16	\$ 100.30	TRAVEL EXPENSES WHILE WORKING AT GRAYS HARBOR FAIR	Failure to identify subv

endor.

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

Violation # Vendor	Date	Amount	Description	Debt that was illegally not reported.
1 SIGNMASTER AWARDS	1/7/2016	\$635.90	STICKERS FOR SIGNS	This should have been reported as debt on the C4 covering the time period of December 2015.
2 BABB JOSHUA A	4/11/2016	\$450.00	MANAGEMENT FEE	This should have been reported as debt on the C4 covering the time period of March 2016.
3 MINUTEMAN PRESS	4/25/2016	\$346.06	PRINTING	This should have been reported as debt on the C4 covering the time period of March 2016.
4 COWLITZ BLACK BEARS	5/5/2016	\$750.00	ADVERTISING IN PROGRAM	This should have been reported as debt on the C4 covering the time period of April 2016.
5 BABB JOSHUA A	5/10/2016	\$1,025.00	MANAGEMENT FEE	This should have been reported as debt on the C4 covering the time period of April 2016.
7 THE DAILY NEWS	5/23/2016	\$348.15	ADS	This should have been reported as debt on the C4 covering the time period of April 2016.
8 THE DAILY NEWS	6/3/2016	\$357.60	AD	This should have been reported as debt on the C4 covering the time period of May 2016.
9 MINUTEMAN PRESS	6/6/2016	\$1,706.43	STATIONERY	This should have been reported as debt on the C4 covering the time period of May 2016.
10 CASSAVA	6/10/2016	\$553.47	FOOD AND BEVERAGE FOR FUNDRAISER	This should have been reported as debt on the C4 covering the time period of May 2016.
11 BABB JOSHUA A	6/11/2016	\$1,009.00	MANAGEMENT FEE	This should have been reported as debt on the C4 covering the time period of May 2016.
12 COLUMBIA RIVER READER	6/25/2016	\$515.00	ADVERTISING	This should have been reported as debt on the C4 covering the time period of May 2016.
13 THE WAHIAKUM COUNTY EAGLE	7/12/2016	\$361.91	ADVERTISING	This should have been reported as debt on the 21 day pre-primary C4.
14 CHINOOK CONSULTING	7/16/2016	\$5,006.11	CONSULTING	This should have been reported as debt on the 21 day pre-primary C4.
15 BABB JOSHUA A	7/17/2016	\$1,941.00	CONSULTING	This should have been reported as debt on the 21 day pre-primary C4.
16 BABB JOSHUA A	7/17/2016	\$796.00	CONSULTING	This should have been reported as debt on the 21 day pre-primary C4.
17 COLUMBIA RIVER READER	7/19/2016	\$515.00	ADVERTISING	This should have been reported as debt on the 21 day pre-primary C4.
18 CHINOOK CONSULTING	7/19/2016	\$5,004.91	CONSULTING	This should have been reported as debt on the 21 day pre-primary C4.
19 THE DAILY NEWS	7/19/2016	\$1,529.67	ADVERTISING	This should have been reported as debt on the 21 day pre-primary C4.
20 CHINOOK CONSULTING	7/27/2016	\$3,762.43	CONSULTING	This should have been reported as debt on the 7-day pre-primary C4.
21 BABB JOSHUA A	8/3/2016	\$983.26	CONSULTING	This should have been reported as debt on the 7-day pre-primary C4.
22 COLUMBIA RIVER READER	8/19/2016	\$515.00	ADS	This should have been reported as debt on the 7-day pre-primary C4.
23 COLUMBIA RIVER READER	9/23/2016	\$515.00	ADVERTISING	This should have been reported as debt on the post-primary C4.
24 THE WAHIAKUM COUNTY EAGLE	10/11/2016	\$472.50	ADVERTISING	This should have been reported as debt on the post-primary C4.
25 THE DAILY NEWS	10/13/2016	\$5,032.12	ADVERTISING	This should have been reported as debt on the post-primary C4.
26 BI COASTAL MEDIA	10/13/2016	\$2,475.00	ADVERTISING	This should have been reported as debt on the post-primary C4.
27 KLOG RADIO	10/13/2016	\$1,545.00	ADVERTISING	This should have been reported as debt on the post-primary C4.
28 JODESHA BROADCASTING INC	10/14/2016	\$3,901.50	ADVERTISING	This should have been reported as debt on the post-primary C4.
29 COLUMBIA RIVER READER	10/19/2016	\$515.00	ADVERTISING	This should have been reported as debt on the 21 day pre-general C4.
30 CAPITOL CITY PRESS	10/19/2016	\$2,441.42	PRINTING/MAILER	This should have been reported as debt on the 21 day pre-general C4.
31 ALPHA MEDIA	10/19/2016	\$2,137.50	ADVERTISING	This should have been reported as debt on the 21 day pre-general C4.
32 CAPITOL CITY PRESS	10/20/2016	\$1,888.22	PRINTING/MAILER	This should have been reported as debt on the 21 day pre-general C4.
33 THE CHINOOK OBSERVER	10/20/2016	\$320.15	ADVERTISING	This should have been reported as debt on the 21 day pre-general C4.
34 FLANNERY PUBLICATIONS	10/20/2016	\$1,759.00	ADVERTISING	This should have been reported as debt on the 21 day pre-general C4.
35 THE WAHIAKUM COUNTY EAGLE	10/27/2016	\$361.20	ADVERTISING	This should have been reported as debt on the 21 day pre-general C4.
36 THE DAILY WORLD	10/28/2016	\$842.62	ADVERTISING	This should have been reported as debt on the 21 day pre-general C4.
37 THE CHINOOK OBSERVER	10/31/2016	\$320.15	ADVERTISING	This should have been reported as debt on the 21 day pre-general C4.
38 SOUND PUBLISHING	11/13/2016	\$1,224.29	NEWSPAPER ADVERTISING	This should have been reported as debt on the 7 day pre-general C4.
39 TAKKO DEAN A	11/14/2016	\$1,079.00	CAMPAIGN MILEAGE - MAY 1 - NOVEMBER 8, 2	This should have been reported as debt on the 7 day pre-general C4.
40 COWLITZ BLACK BEARS	4/18/2017	\$600.00	ADVERTISING IN PROGRAM	This should have been reported as debt on the C4 covering the time period of March 2017.
<b>Total</b>		<b>\$55,541.57</b>		

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

Violation #	Contribution_date	Deposit Date	Days Late	Deposit	C3 Due Date	Date Reported	Days Late Reported	Amount	Contributor
1	7/29/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$500.00	TAYLOR WILLIAM
2	7/29/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$500.00	MICROSOFT CORPORATION POLITICAL ACTION
3	7/29/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$500.00	SMILE BRANDS INC
4	7/29/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$250.00	TESORO COMPANIES INC
5	7/29/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$250.00	SHELDON RICHARD
6	8/1/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$500.00	NOVARTIS PHARMACEUTICALS CORPORATION
7	8/1/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$1,000.00	WASHINGTON STATE DENTAL PAC
8	8/1/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$1,000.00	WASHINGTON STATE DENTAL PAC
9	8/1/2016	8/4/2016	0		8/8/2016	8/17/2016	9	\$500.00	UNION PACIFIC RAILROAD COMPANY
10	5/30/2016	6/4/2016	0		6/6/2016	6/9/2016	3	\$50.00	BEASLEY DALE
11	5/30/2016	6/4/2016	0		6/6/2016	6/9/2016	3	\$100.00	BARTO DALE
12	5/30/2016	6/4/2016	0		6/6/2016	6/9/2016	3	\$40.00	KARNOFSKI MICHAEL
13	5/30/2016	6/4/2016	0		6/6/2016	6/9/2016	3	\$125.00	BROCK CAROLYN
14	6/1/2016	6/4/2016	0		6/6/2016	6/9/2016	3	\$500.00	PACIFIC NORTHWEST REGIONAL COUNCIL OF
15	6/3/2016	6/4/2016	0		6/6/2016	6/9/2016	3	\$1,000.00	LABORERS' INTERNATIONAL UNION OF NORTH
<b>Total</b>								<b>\$6,815.00</b>	

N COMMITTEE

N

CARPENTERS  
H AMERICA LOCAL NO. 252

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

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Ui	Amount	Description	
1	9/1/2014	10/14/2014	10/11/2016	728	EXPENSES I	\$100.00		100725725
2	9/2/2014	10/14/2014	10/11/2016	728	TAKKO DE/	\$495.45	AUG, 2014 TRAVEL	100725725
3	9/22/2014	10/14/2014	10/11/2016	728	COLUMBIA	\$528.75	ADVERTISING	100725725
4	10/2/2014	10/14/2014	10/11/2016	728	THE WAHK	\$549.00	ADVERTISING	100725725
5	10/2/2014	10/14/2014	10/11/2016	728	THE CHINC	\$2,236.00	ADVERTISING	100725725
6	10/3/2014	10/14/2014	10/11/2016	728	TAKKO DE/	\$175.00	SEPT, 2014 TRAVEL	100725725
7	10/7/2014	10/14/2014	10/11/2016	728	THE DAILY	\$3,680.00	ADVERTISING	100725725
8	10/9/2014	10/14/2014	10/11/2016	728	EDDI PETEI	\$75.00	ROOM, COFFEE AND APPETIZERS FOR FUNDRAISER	100725725
9	10/11/2014	10/14/2014	10/11/2016	728	THE DAILY	\$3,318.28	ADVERTISING	100725725
10	10/13/2014	10/14/2014	10/11/2016	728	FLANNERY	\$6,542.20	ADVERTISING	100725725
11	9/5/2014	10/14/2014	10/11/2016	728	WASHINGT	\$150.00	REFRESHMENTS	100725725
12	10/13/2014	10/14/2014	10/11/2016	728	WASHINGT	\$25.00	BEVERAGES FOR FUNDRAISER	100725725
13	10/14/2014	10/28/2014	10/11/2016	714	THE WAHK	\$1,800.75	ADVERTISING	100725730
14	10/16/2014	10/28/2014	10/11/2016	714	COWLITZ C	\$250.00	DONATION	100725730
15	10/17/2014	10/28/2014	10/11/2016	714	KELSO DOV	\$100.00	DONATION	100725730
16	10/23/2014	10/28/2014	10/11/2016	714	COLUMBIA	\$528.75	ADVERTISING	100725730
17	10/24/2014	10/28/2014	10/11/2016	714	COWLITZ B	\$750.00	ADVERTISING	100725730
18	10/28/2014	12/10/2014	10/11/2016	671	EXPENSES I	\$90.00		100725735
19	10/30/2014	12/10/2014	10/11/2016	671	TAKKO DE/	\$229.00	OCT '14 TRAVEL	100725735
20	11/7/2014	12/10/2014	10/11/2016	671	TAKKO DE/	\$10,000.00	TRANSFER TO SURPLUS	100725735
21	11/28/2014	12/10/2014	10/11/2016	671	COLUMBIA	\$125.00	AD	100725735
22	12/1/2014	1/12/2015	10/11/2016	638	EXPENSES I	\$50.00		100725738
23	12/9/2014	1/12/2015	10/11/2016	638	OFFICE DEI	\$99.34	OFFICE SUPPLIES	100725738
24	1/1/2015	2/28/2015	10/11/2016	591	EXPENSES I	\$50.00		100725768
25	2/1/2015	3/10/2015	10/11/2016	581	EXPENSES I	\$50.00		100725769
26	3/1/2015	4/10/2015	10/11/2016	550	EXPENSES I	\$90.00		100725771
27	4/1/2015	5/11/2015	10/11/2016	519	EXPENSES I	\$50.00		100725772
28	4/21/2015	5/11/2015	10/11/2016	519	US POSTAL	\$178.00	POSTAGE AND MAILBOX RENTAL	100725772
29	5/1/2015	6/10/2015	10/11/2016	489	EXPENSES I	\$50.00		100725774
30	5/5/2015	6/10/2015	10/11/2016	489	DOLLARS F	\$200.00	ADVERTISING	100725774
31	5/21/2015	6/10/2015	10/11/2016	489	TAKKO DE/	\$175.30	ATTEND LOYALTY DAY FUNCTION	100725774
32	6/1/2015	7/14/2015	10/11/2016	455	EXPENSES I	\$50.00		100725775
33	6/6/2015	7/14/2015	10/11/2016	455	OFFICE MA	\$74.51	OFFICE SUPPLIES	100725775
34	7/1/2015	7/14/2015	10/11/2016	455	EXPENSES I	\$50.00		100725776
35	7/6/2015	7/14/2015	10/11/2016	455	COWLITZ B	\$450.00	ADVERTISING	100725776
36	8/1/2015	9/10/2015	10/11/2016	397	EXPENSES I	\$98.89		100725785
37	9/1/2015	10/13/2015	10/11/2016	364	EXPENSES I	\$50.00		100725787
38	10/1/2015	10/13/2015	10/11/2016	364	EXPENSES I	\$50.00		100725789
39	10/14/2015	10/27/2015	10/11/2016	350	US POSTAL	\$245.00	POSTAGE	100725789
40	11/1/2015	12/10/2015	10/11/2016	306	EXPENSES I	\$50.00		100725794
41	9/1/2016	10/18/2016	4/9/2017	173	EXPENSES I	\$28.44		100755098
42	9/3/2016	10/18/2016	4/9/2017	173	SPRINT	\$100.00	TELEPHONE EXPENSES	100755098
43	9/8/2016	10/18/2016	4/9/2017	173	BABB JOSH	\$142.00	CONSULTING	100755098
44	9/8/2016	10/18/2016	4/9/2017	173	SPRINT	\$100.00	TELEPHONE	100755098
45	9/23/2016	10/18/2016	4/9/2017	173	COLUMBIA	\$515.00	ADVERTISING	100755098
46	10/5/2016	10/18/2016	4/9/2017	173	SPRINT	\$100.00	TELEPHONE EXPENSE	100755098
47	10/11/2016	10/18/2016	4/9/2017	173	THE WAHK	\$472.50	ADVERTISING	100755098
48	10/13/2016	10/18/2016	4/9/2017	173	BI COASTA	\$2,475.00	ADVERTISING	100755098
49	10/13/2016	10/18/2016	4/9/2017	173	KLOG RADI	\$1,545.00	ADVERTISING	100755098
50	10/13/2016	10/18/2016	4/9/2017	173	THE DAILY	\$5,032.12	ADVERTISING	100755098
51	10/14/2016	10/18/2016	4/9/2017	173	JODESHA E	\$3,901.50	ADVERTISING	100755098
52	10/19/2016	11/1/2016	4/9/2017	159	ALPHA ME	\$2,137.50	ADVERTISING	100755099
53	10/19/2016	11/1/2016	4/9/2017	159	COLUMBIA	\$515.00	ADVERTISING	100755099
54	10/19/2016	11/1/2016	4/9/2017	159	CAPITOL CI	\$2,441.42	PRINTING/MAILER	100755099
55	10/20/2016	11/1/2016	4/9/2017	159	THE CHINC	\$320.15	ADVERTISING	100755099
56	10/20/2016	11/1/2016	4/9/2017	159	FLANNERY	\$1,759.00	ADVERTISING	100755099
57	10/20/2016	11/1/2016	4/9/2017	159	CAPITOL CI	\$1,888.22	PRINTING/MAILER	100755099
58	10/24/2016	11/1/2016	4/9/2017	159	TAKKO DE/	\$114.53	HOTEL COST FOR CAMPAIGNING IN ABERDEEN	100755099
59	10/27/2016	11/1/2016	4/9/2017	159	COWLITZ C	\$200.00	REIMBURSE FOR CAMPAIGN EXPENSE	100755099
60	10/27/2016	11/1/2016	4/9/2017	159	THE WAHK	\$361.20	ADVERTISING	100755099
61	10/28/2016	11/1/2016	4/9/2017	159	THE DAILY	\$842.62	ADVERTISING	100755099
62	10/29/2016	11/1/2016	4/9/2017	159	OFFICE MA	\$148.99	OFFICE SUPPLIES	100755099
63	10/31/2016	11/1/2016	4/9/2017	159	THE CHINC	\$320.15	ADVERTISING	100755099
64	11/5/2016	12/12/2016	4/9/2017	118	SPRINT	\$100.00	TELEPHONE EXPENSE	100755100
65	11/13/2016	12/12/2016	4/9/2017	118	SOUND PU	\$1,224.29	NEWSPAPER ADVERTISING	100755100
66	11/14/2016	12/12/2016	4/9/2017	118	TAKKO DE/	\$1,079.00	CAMPAIGN MILEAGE - MAY 1 - NOVEMBER 8, 2016	100755100
67	12/23/2016	1/10/2017	4/9/2017	89	TAKKO DE/	\$100.00	TELEPHONE EXPENSE	100755101
68	8/4/2016	9/12/2016	10/11/2016	29	DEAN TAKI	\$46,714.08	TRANSFER FROM DEAN TAKKO FOR STATE REPRESENTATIVE	100725796
69	7/18/2017	7/25/2017	8/9/2017	15	TAKKO DE/	\$100.00	TELEPHONE EXPENSES	100781576
70	6/20/2017	7/11/2017	7/20/2017	9	TAKKO DE/	\$100.00	TELEPHONE EXPENSE	100776268
71	12/7/2015	1/11/2016	1/15/2016	4	OFFICE MA	\$96.10	OFFICE SUPPLIES	100675633

72	12/8/2015	1/11/2016	1/15/2016	4 SPRINT	\$100.00	TELEPHONE EXPENSE	100675633
73	2/6/2016	3/10/2016	3/14/2016	4 SPRINT	\$100.00	TELEPHONE	100686680
74	1/11/2014	2/10/2014	2/11/2014	1 OFFICE DEI	\$140.90	OFFICE SUPPLIES	100566654
75	2/1/2014	3/10/2014	3/11/2014	1 EXPENSES I	\$50.00		100571019
76	7/15/2014	7/29/2014	7/30/2014	1 EXPENSES I	\$20.00		100594223
77	7/21/2014	7/29/2014	7/30/2014	1 THE WAHK	\$339.00	ADVERTISING	100594223
78	7/21/2014	7/29/2014	7/30/2014	1 THE CHINC	\$1,736.00	ADVERTISEMENT	100594223
79	7/23/2014	7/29/2014	7/30/2014	1 THE DAILY	\$2,799.10	ADVERTISING	100594223
80	7/25/2014	7/29/2014	7/30/2014	1 THOMPSON	\$1,156.29	T SHIRTS	100594223
81	7/12/2016	7/26/2016	7/27/2016	1 THE WAHK	\$361.91	ADVERTISING	100712016
82	7/12/2016	7/26/2016	7/27/2016	1 EXPENSES I	\$18.27		100712016
83	7/14/2016	7/26/2016	7/27/2016	1 DUFFY'S	\$220.00	FUNDRAISER	100712016
84	7/16/2016	7/26/2016	7/27/2016	1 CHINOOK C	\$5,006.11	CONSULTING	100712016
85	7/17/2016	7/26/2016	7/27/2016	1 BABB JOSH	\$1,941.00	CONSULTING	100712016
86	7/17/2016	7/26/2016	7/27/2016	1 BABB JOSH	\$119.00	CONSULTING	100712016
87	7/17/2016	7/26/2016	7/27/2016	1 BABB JOSH	\$796.00	CONSULTING	100712016
88	7/18/2016	7/26/2016	7/27/2016	1 SPRINT	\$100.00	TELEPHONE	100712016
89	7/18/2016	7/26/2016	7/27/2016	1 FRED MEYI	\$59.08	FUNDRAISER SUPPLIES	100712016
90	7/18/2016	7/26/2016	7/27/2016	1 FRED MEYI	\$93.18	FUNDRAISER SUPPLIES	100712016
91	7/19/2016	7/26/2016	7/27/2016	1 COLUMBIA	\$515.00	ADVERTISING	100712016
92	7/19/2016	7/26/2016	7/27/2016	1 CHINOOK C	\$5,004.91	CONSULTING	100712016
93	7/19/2016	7/26/2016	7/27/2016	1 THE DAILY	\$1,529.67	ADVERTISING	100712016

**Total      \$131,038.45**