

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

[Glenmorgan89](#) reported 9 days ago (Tue, 5 Sep at 10:24 PM) via Portal [Meta](#)

To Whom it may Concern:

It has come to my attention that there is evidence and reason to believe substantial provisions of **RCW 42.17A** have been violated by Steve Bergquist, a Washington State Representative from the 11th Legislative District.

**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, Bergquist has failed on numerous occasions to do this. **(See Exhibits A - "Illegally late deposits and contributions" and Exhibit B "Illegally late reported expenditures and in-kind contributions")**.

The PDC should investigate the possibility that Bergquist 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.

Best Regards,

Glen Morgan

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

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
1	1/17/2017	2/10/2017	4/10/2017	59	U.S. POSTAL SERVICE	\$228.00	PO BOX RENEWAL
2	1/29/2017	2/10/2017	4/10/2017	59	DEPARTMENT OF THE TREASURY	\$4.45	FEDERAL PAYROLL TAXES
3	7/14/2016	7/26/2016	9/17/2016	53	HINES JOE A	\$26.92	KICK OFF FUNDRAISER SUPPLIES
4	7/16/2016	7/26/2016	9/17/2016	53	PAYPAL	\$1.75	PAYPAL FEE (HINES)
5	7/16/2016	7/26/2016	9/17/2016	53	PAYPAL	\$1.03	PAYPAL FEE (PARRISH)
6	7/16/2016	7/26/2016	9/17/2016	53	PAYPAL	\$3.20	PAYPAL FEE (PODOLOWSKI)
7	7/16/2016	7/26/2016	9/17/2016	53	PAYPAL	\$1.75	PAYPAL FEE (GLASGOW)
8	7/18/2016	7/26/2016	9/17/2016	53	PAYPAL	\$3.20	PAYPAL FEE (EKBERG)
9	7/18/2016	7/26/2016	9/17/2016	53	PAYPAL	\$9.00	PAYPAL FEE (KING)
10	7/19/2016	7/26/2016	9/17/2016	53	11TH DISTRICT DEMOCRATS	\$100.00	EVENT SPONSORSHIP
11	7/20/2016	7/26/2016	9/17/2016	53	WASHINGTON STATE DEMOCRATS	\$704.10	VOTE BUILDER SUBSCRIPTION
12	6/2/2016	7/12/2016	7/25/2016	13	EMPLOYMENT SECURITY DEPARTMENT	\$24.99	PAYROLL TAXES
13	6/2/2016	7/12/2016	7/25/2016	13	WASHINGTON DEPT OF LABOR & INDUSTRIES	\$35.23	PAYROLL TAXES
14	6/15/2016	7/12/2016	7/25/2016	13	EMPLOYMENT SECURITY DEPARTMENT	\$23.01	PAYROLL TAXES
15	6/16/2016	7/12/2016	7/25/2016	13	EMPLOYMENT SECURITY DEPARTMENT	\$0.91	PAYROLL TAXES
16	7/3/2016	7/12/2016	7/25/2016	13	PAYPAL	\$1.75	PAYPAL FEE
17	7/5/2016	7/12/2016	7/25/2016	13	EMPLOYMENT SECURITY DEPARTMENT	\$25.70	PAYROLL TAXES
18	7/5/2016	7/12/2016	7/25/2016	13	HINES JOE A	\$153.54	WAGES
19	6/14/2016	7/12/2016	7/25/2016	13	BARUAH ANITA	\$37.22	OFFICE SUPPLIES
20	6/17/2016	7/12/2016	7/25/2016	13	ACES TENNIS, INC.	\$120.00	VENUE FOR LOW-COST FUNDRAISER

21	6/24/2016	7/12/2016	7/25/2016	13	ACES TENNIS, INC.	\$120.00	VENUE FOR LOW-COST FUNDRAISER
22	7/10/2016	7/12/2016	7/25/2016	13	BERGQUIST STEVEN A	\$127.40	KICKOFF SUPPLIES
23	10/23/2015	10/27/2015	11/5/2015	9	US POSTAL SERVICE	\$49.00	POSTAGE
24	11/8/2016	12/12/2016	12/16/2016	4	PAYPAL	\$6.10	PAYPAL CHARGES
25	11/30/2016	12/12/2016	12/16/2016	4	WASHINGTON STATE EMPLOYMENT SECURITY DEPARTMENT	\$9.77	UNEMPLOYMENT INSURANCE
26	9/8/2016	10/18/2016	10/19/2016	1	BERGQUIST STEVEN A	\$18.80	POSTAGE
					<b>Total</b>	<b>\$1,836.82</b>	

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

Violation #	Contribution_date	Deposit Date	Days Late	Due Date C3	Date Filed	Days Late Reported	Amount	Contributor
1	2/27/2017	2/27/2017	0	3/10/2017	4/10/2017	31	\$16.14	MISCELLANEOUS RECEIPTS
2	6/1/2016	6/1/2016	0	6/6/2016	7/5/2016	29	\$150.00	OUTCOMES BY LEVY LLC
3	6/24/2016	6/24/2016	0	6/27/2016	7/24/2016	27	\$250.00	EDUCATION MANAGEMENT II LLC
4	5/3/2016	5/3/2016	0	6/10/2016	7/5/2016	25	\$250.00	PUGET SOUND PILOTS PAC
5	5/3/2016	5/3/2016	0	6/10/2016	7/5/2016	25	\$1,000.00	BARUAH ARATI
6	5/3/2016	5/3/2016	0	6/10/2016	7/5/2016	25	\$1,000.00	BARUAH PRANAB
7	6/6/2016	6/6/2016	0	6/13/2016	7/5/2016	22	\$1,000.00	RENTON FIREFIGHTERS LOCAL 864
8	6/6/2016	6/6/2016	0	6/13/2016	7/5/2016	22	\$1,000.00	RENTON FIREFIGHTERS LOCAL 864
9	6/23/2016	6/23/2016	0	6/27/2016	7/5/2016	8	\$250.00	WA ST COUNCIL OF POLICE & POLITICAL SUPPORT
10	6/23/2016	6/23/2016	0	6/27/2016	7/5/2016	8	\$1,000.00	WA ST TROOPERS PAC
11	8/15/2016	8/19/2016	0	8/22/2016	8/28/2016	6	\$132.00	PROCEEDS FROM LOW COST FUNDRAISER
12	8/15/2016	8/15/2016	0	8/22/2016	8/28/2016	6	\$1,000.00	WA SCHOOL PRINCIPALS LEG EFF ASSN
13	8/19/2016	8/19/2016	0	8/22/2016	8/28/2016	6	\$1,000.00	WA MEDICAL PAC
14	8/19/2016	8/19/2016	0	8/22/2016	8/28/2016	6	\$50.00	FRENCH LARRY
15	8/19/2016	8/19/2016	0	8/22/2016	8/28/2016	6	\$50.00	FRENCH MARY KAY
16	10/23/2015	10/23/2015	0	10/26/2015	10/29/2015	3	\$500.00	JUSTICE FOR ALL PAC
17	10/23/2015	10/23/2015	0	10/26/2015	10/29/2015	3	\$500.00	WASHINGTON BEER & WINE DISTBUTORS
18	10/23/2015	10/23/2015	0	10/26/2015	10/29/2015	3	\$500.00	WA STATE AUTO DEALERS PAC
19	10/23/2015	10/23/2015	0	10/26/2015	10/29/2015	3	\$400.00	VIDEO GAME IMPACT, INC
20	10/14/2016	10/14/2016	0	10/17/2016	10/18/2016	1	\$500.00	PHRMA
21	10/14/2016	10/14/2016	0	10/17/2016	10/18/2016	1	\$1,000.00	ASH GROVE CEMENT COMPANY
22	10/14/2016	10/14/2016	0	10/17/2016	10/18/2016	1	\$500.00	VULCAN INC.

**Total                      \$12,048.14**