

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported 14 days ago (Tue, 22 Aug at 11:53 PM) via Portal [Meta](#)

To whom it may concern,

It has come to my attention that a wide variety and quantity of violations of **RCW 42.17A** may have been committed by Mike Kreidler during his successful 2016 campaign for Washington State Insurance Commissioner. The details of these violations are as follows:

(1) Failure to timely file accurate C3 and C4 reports (Violation of RCW 42.17A.235)

RCW [42.17A.235](#) requires candidates and committees to file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Mr. Kreidler violated this statute as follows:

- Mr. Kreidler reported paying \$50.08 to Verizon Wireless on 2/17/13 for “broadband wireless” (see Report No. [100516617](#)). Mr. Kreidler later reported (on 4/9/13) that he did not make this expenditure (see Report No. [100519410](#)). Mr. Kreidler should have made the correction no later than 3/11/13. Instead, he illegally reported this information **29 days past the statutory deadline.**
- In Report No. [100666503](#), Mr. Kreidler reported depositing \$250 on 11/2/15. Mr. Kreidler later amended the report, changing the date of deposit to 10/30/15 (see Report No. [100672238](#)). Mr. Kreidler should have made the correction no later than 12/10/15 (the deadline for the 10/27/15 to 11/30/15 period). Instead, Mr. Kreidler made the correction on 12/14/15, **4 days past the statutory deadline.**
- On 8/1/16, Mr. Kreidler paid \$1250 to Michelle Fowler for “contract professional services thru 7/3-/16” (see Report No. [100718364](#)). The next time Mr. Kreidler paid Ms. Fowler, it was \$3750 for “3 month service as campaign manager,” which he paid to Ms. Fowler on 11/21/16 (see Report No. [100736337](#)). Ms. Fowler charged Mr. Kreidler \$1250 per month for campaign-manager services. Mr. Kreidler made **2 violations.**
 - The first payment of \$1250 was for work performed during the month of July 2016, which Mr. Kreidler should have reported as a debt obligation no later than 7/12/16 (the due date for the 6/1/16 to 7/11/16 period). Instead, Mr.

Kreidler reported the expenditure on 9/5/16, **56 days past the statutory deadline.**

- The second payment of \$3750 was for work that commenced in August 2016. Mr. Kreidler should have reported the \$3750 as a debt obligation no later than 9/12/16 (the due date for the 7/26/16 to 8/31/16 period). Instead, Mr. Kreidler reported the \$3750 expenditure on 12/3/16, **82 days past the statutory deadline.**
- In Report No. [100752281](#), Mr. Kreidler paid \$40,000 to Mike Kreidler Surplus Funds for “transfer to surplus account” on 1/31/17. Mr. Kreidler should have reported this transfer no later than 2/10/17. Instead, he reported it on 3/10/17, **28 days past the statutory deadline. Please note, this is a transfer of \$40,000 reported nearly one month late.**

(2) Failure to timely report accurate expenditures (Violation of RCW 42.17A.240).

RCW [42.17A.240](#) requires candidates and committees to report contributions and expenditures. Mr. Kreidler **violated this statute at least twice** during a fundraising trip to Chicago.

In Report No. [100697865](#), Mr. Kreidler reported making expenditures during a fundraising trip to Chicago (Uber, taxi, and meals). Mr. Kreidler failed to disclose expenditures (or in-kind contributions) for air travel to and from Chicago, and lodging while he was there. It is possible that Mr. Kreidler slept in free accommodations while he was there, but since his attendance at a fundraiser was involved, his out-of-state overnight accommodations would have to be reported to the PDC.

(3) Failure to describe goods and/or services in detail, a failure to accurately break down expenditures (Violation of RCW 42.17A.235 & .240)

Mr. Kreidler made numerous violations of RCW [42.17A.235](#) and [42.17A.240](#)(6) (which requires a candidate to disclose “the name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure”), and WAC [390-16-037](#)(3) (which requires a candidate to “describe in detail the goods and/or services to be provided by the recipient of the expenditure”). **WAC 390-16-037** also provides three examples of the detail required (Examples A, B and C below).

"Example A: If an expenditure is for a get-out-the-vote campaign, the purpose shall include the following details:

Vendor Name	Purpose	Amount
XYZ Consulting	GOTV—phone bank 28th and 29th Legislative districts	\$1,000

Example B: If an expenditure is for printing, the purpose shall include the following details:

Vendor Name	Purpose	Amount
ABC Printing	5,000 brochures	\$3,000

Example C: If an expenditure is for broadcast political advertisements, the purpose shall include the following details:

Vendor Name	Purpose	Amount
Media King	Television ads	\$50,000
	WZUB TV	\$30,000
	WXXX TV	\$10,000
	WCRB TV	\$10,000

September 2013

- In Report No. [100545567](#), Mr. Kreidler made a \$310.08 expenditure to Mercury Direct for “mailing services” on 9/23/13. Mr. Kreidler failed to disclose what the mailing services were for (e.g., fundraising invitation).
- In Report No. [100545567](#), Mr. Kreidler made a \$1077.15 expenditure to Capitol City Press for “printing” on 9/25/13. Mr. Kreidler failed to disclose the quantity and purpose of the printing (e.g., fundraising invitation, remit envelopes).
- In Report No. [100545567](#), Mike Watson made a \$10 in-kind contribution for “banquet permit fee” on 9/9/13. Mr. Kreidler failed to disclose name of the actual vendor and the vendor’s address.

October 2013

- In Report No. [100551977](#), Mike Watson made a \$47.88 in-kind contribution for “pumpkins for Oktoberfest” on 10/1/13. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

- In Report No. [100551977](#), Mike Watson made a \$43.16 in-kind contribution for “decorations for Oktoberfest” on 10/8/13. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100551977](#), Mike Watson made a \$24.90 in-kind contribution for “supplies for fundraiser” on 10/9/13. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

- September 2014

- In Report No. [100604566](#), Mr. Kreidler paid \$838.54 to Capitol City Press for “printing” on 9/27/14. Mr. Kreidler failed to disclose the quantity and purpose of the printing (e.g., remit envelopes, mailer).

- October 2014

- In Report No. [100612507](#), Mr. Kreidler paid \$400 to Mike Watson for “reimbursement for hall rental” on 10/1/14. Mr. Kreidler failed to disclose name and address of the actual vendor.
- In Report No. [100612507](#), Mr. Kreidler paid \$182.42 to Sarah Ryan for “reimbursement for wine purchase for fundraiser” on 10/7/14. Mr. Kreidler failed to disclose name and address of the actual vendor.
- In Report No. [100612507](#), Mr. Kreidler paid \$100 to Ken Corliss for “refund of contribution” on 10/9/14. Mr. Kreidler failed to disclose what the contribution was (e.g., cash donation, in-kind item for fundraiser), the name of the actual vendor, and the vendor’s address.
- In Report No. [100612507](#), Mr. Kreidler received a \$593.13 in-kind contribution from Elizabeth Berendt for “food for fundraiser” on 10/8/14. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address. A complete description of what type of food was provided was also left out.
- In Report No. [100612507](#), Mr. Kreidler received a \$593.13 in-kind contribution from Paul Berendt for “food for fundraiser” on 10/8/14. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100612507](#), Mr. Kreidler received a \$41.22 in-kind contribution from Mike Watson for “misc items for fundraiser” on 10/8/14. Mr. Kreidler failed to disclose what the items were, the name of the actual vendor, and the vendor’s address.

- April 2015

- In Report No. [100635789](#), Mr. Kreidler paid \$400 to Sue Hedrick for “reimbursement for payment of hall rental fee” on 4/17/15. Mr. Kreidler

failed to disclose the name of the actual vendor, the vendor's address, and the date the rental hall fee was originally paid.

- In Report No. [100635789](#), Mr. Kreidler paid \$128 to Jennifer Kraft for "reimburse for PO Box rental for 12 months" on 4/27/15. Mr. Kreidler failed to disclose the name of the actual vendor, the vendor's address, and the date the PO box was originally paid for.

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October 2015

- In Report No. [100667417](#), Mr. Kreidler paid \$624.66 to Capital City Press for "remits and flyers for Oktoberfest event" on 10/1/15. Mr. Kreidler failed to disclose the quantity of remits and flyers.

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November 2015

- In Report No. [100670595](#), Mr. Kreidler paid \$988.70 to Capital City Press for "remits and flyers for Oktoberfest" on 11/3/15. Mr. Kreidler failed to disclose the quantity of remits and flyers.

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December 2015

- In Report No. [100673137](#), Mr. Kreidler paid \$153.34 to himself for "reimburse for new broadband wireless" on 12/2/15. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor's address.
- In Report No. [100673137](#), Mr. Kreidler received a \$140.30 in-kind contribution from Jim Freeburg for "beverages and supplies" on 12/8/15. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor's address.

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March 2016

- In Report No. [100689403](#), Mr. Kreidler paid \$128.10 to himself for "broadband wireless" on 3/13/16. Mr. Kreidler failed to disclose the actual vendor and the vendor's address.
- In Report No. [100689403](#), Mr. Kreidler paid \$78.12 to Steve Valandra for "internet set up charges" on 3/13/16. Mr. Kreidler failed to disclose the actual vendor and the vendor's address

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April 2016

- In Report No. [100693253](#), Mr. Kreidler paid \$78.12 to Steve Valandra for "campaign telephone" on 4/14/16. Mr. Kreidler failed to disclose the actual vendor and the vendor's address.

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May 2016

- In Report No. [100697865](#), Mr. Kreidler paid \$57 to himself for “reimburse for taxi in Chicago” on 5/7/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100697865](#), Mr. Kreidler paid \$40 to Goldwater Taplin Group for “reimburse for meal in Chicago” on 5/7/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100697865](#), Mr. Kreidler paid \$19.22 to Goldwater Taplin Group for “reimburse for Uber car – Chicago” on 5/7/16. Mr. Kreidler failed to disclose the address of the actual vendor (Uber).
- In Report No. [100697865](#), Mr. Kreidler paid \$129.31 to Goldwater Taplin Group for “reimburse for Uber car in Chicago” on 5/7/16. Mr. Kreidler failed to disclose the address of the actual vendor (Uber).
- In Report No. [100697865](#), Mr. Kreidler paid \$1519.12 to Capital City Press for “solicitation materials” on 5/7/16. Mr. Kreidler failed to disclose what the solicitation materials were (e.g., remit envelopes, fundraising letter) and the quantity.
- In Report No. [100697865](#), Mr. Kreidler paid \$1216.28 to himself for “reimburse for filing fee pd to Sec. St.” on 5/17/16. Mr. Kreidler failed to disclose the address of the actual vendor (Washington State Secretary of State).
- In Report No. [100697865](#), Mr. Kreidler paid \$286.11 to Capital City Press for “invoice 109721” on 5/21/16. Mr. Kreidler failed to disclose what the item is, the purpose of the item, and the quantity.
- In Report No. [100697865](#), Mr. Kreidler paid \$100 to Lela Kreidler for “reimburse for broadband wireless” on 5/30/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

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6/1/16 to 7/11/16

- In Report No. [100708127](#), Mr. Kreidler paid \$27 to himself for “reimburse parking fees – WEA, Dem. Conv” on 7/4/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

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7/12/16 to 7/25/16

- In Report No. [100710876](#), Mr. Kreidler paid \$51.30 to Goldwater Taplin Group for “reimburse for dinner at fundraiser” on 7/15/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100710876](#), Mr. Kreidler paid \$39.03 to Steve Valandra for “reimburse for campaign phone” on 7/22/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

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7/26/16 to 8/31/16

- In Report No. [100718364](#), Mr. Kreidler paid \$1250 to Michelle Fowler for “contract professional services thru 7/3-/16” on 8/1/16. Mr. Kreidler failed to disclose the purpose of the “professional services” (e.g., polling, voter analysis, writing, campaign management).
- In Report No. [100718364](#), Mr. Kreidler paid \$39.03 to Steve Valandra for “reimburse for telephone” on 8/18/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

9/1/16 to 10/17/16

- In Report No. [100728328](#), Mr. Kreidler paid \$444.42 to Sue Hedrick for “reimb. tables in lieu of rent for Oktoberfest” on 9/5/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100728328](#), Mr. Kreidler paid \$39.03 to Steve Valandra for “monthly telephone” on 9/14/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100728328](#), Mr. Kreidler paid \$1511.40 to Capital City Press for “printing fundraising mailer” on 9/26/16. Mr. Kreidler failed to disclose the quantity.
- In Report No. [100728328](#), Mr. Kreidler paid \$494.21 to Capital City Press for “printing remits” on 10/9/16. Mr. Kreidler failed to disclose the quantity.
- In Report No. [100728328](#), Mr. Kreidler paid \$39.03 to Steve Valandra for “reimburse for campaign phone” on 10/16/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100728328](#), Mr. Kreidler received a \$38.09 in-kind contribution from Jim Freeburg for “beverages for fundraiser” on 10/5/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100728328](#), Mr. Kreidler received a \$21.54 in-kind contribution from Jennifer Kraft for “ice for fundraiser” on 10/5/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100728328](#), Mr. Kreidler received a \$236.71 in-kind contribution from Joseph Dejesus for “food and beverages at fund raiser” on 10/6/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100728328](#), Mr. Kreidler received a \$236.72 in-kind contribution from Brady McDonald for “food and beverages for fund raiser” on 10/6/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

10/18/16 to 10/31/16

- In Report No. [100733069](#), Mr. Kreidler paid \$48,000 to Cerillion N4 Partners for “cable TV buy” on 10/31/16. Mr. Kreidler failed to disclose the names of the media outlets, the amount of money paid to each outlet, and the dates the ads appeared.

November 2016

- In Report No. [100736337](#), Mr. Kreidler paid \$39.03 to Steve Valandra for “monthly phone charge” on 11/15/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100736337](#), Mr. Kreidler paid \$60 to Goldwater Taplin Group for “reimburse for meals” on 11/20/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100736337](#), Mr. Kreidler paid \$60 to Enstar (US) Inc. for “reimburse for meals” on 11/20/16. Mr. Kreidler failed to disclose the name of the actual vendor and the vendor’s address.

(4) Failure to identify treasurer’s function (Violation of RCW 42.17A.205(2)(k)).

RCW [42.17A.205](#)(2)(k) requires a candidate to file a statement of organization that identifies “the name, address, and title of any person who authorizes expenditures or makes decisions on behalf of the candidate. Furthermore, RCW [42.17A.205](#)(2)(l) requires “the name, address, and title of any person who is paid by or is a volunteer for a candidate . . . to perform ministerial functions on behalf of two or more candidates or committees.”

In his [amended C1 Report](#), Mr. Kreidler violated RCW [42.17A.205](#) by failing to state whether treasurer James Odiome would perform only ministerial functions.

The PDC should investigate the possibility that Mike Kreidler 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