

File a Formal Complaint - Glen Morgan

Glenmorgan89 reported (Thu, 12 Oct at 11:06 PM) via Portal **Meta**
To Whom it May Concern --

It has come to my attention that the Clark County Democratic Women have 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, the Clark County Democratic Women has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

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.

The Clark County Democratic Women illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

**3) Failure to properly break down, describe expenses.
(Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)**

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** and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4.

The Clark County Democratic Women illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that the Clark County Democratic Women 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
3 Attachments

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		244		As of --		10/12/2017		
Violation #	Vendor	Date	Amount	Description	Violation	Violation	Report #	Approx. days late as of today
1	ARCHER JOLMA KATIE	1/21/2017	\$ 102.00	REIMBURESEMENT		Failure to identify subvendor.	100759283	244

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		309		As of -- 10/12/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late	
1	ADCO	3/7/2017	\$ 542.00	OFFICE SUPPLIES	This should have been reported as debt on the C4 covering the time period of February 2017.	216	4/10/2017
2	FOODE CAFE AND CATERING	7/14/2017	\$ 324.00	CATERED LUNCH	This should have been reported as debt on the 21 day pre-primary C4.	93	7/25/2017
		Total	\$ 866.00				

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 1265

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100759283	C4	Y		2/10/2017	5/9/2017	88
2	100759282	C3	Y	1/21/2017	2/10/2017	5/9/2017	88
3	100759281	C3	Y	1/25/2017	2/10/2017	5/9/2017	88
4	100790885	C3	N	7/11/2017	7/17/2017	10/8/2017	83
5	100790886	C3	N	7/13/2017	7/17/2017	10/8/2017	83
6	100756824	C4	N		2/10/2017	4/18/2017	67
7	100756822	C3	N	1/25/2017	2/10/2017	4/18/2017	67
8	100756823	C3	N	1/17/2017	2/10/2017	4/18/2017	67
9	100759284	C4	Y		3/10/2017	5/9/2017	60
10	100756825	C4	N		3/10/2017	4/18/2017	39
11	100756819	C3	N	2/24/2017	3/10/2017	4/18/2017	39
12	100756820	C3	N	2/6/2017	3/10/2017	4/18/2017	39
13	100756821	C3	N	2/25/2017	3/10/2017	4/18/2017	39
14	100774397	C3	Y	6/11/2017	6/12/2017	7/11/2017	29
15	100774385	C3	N	6/11/2017	6/12/2017	7/11/2017	29
16	100790887	C3	N	9/6/2017	9/11/2017	10/8/2017	27
17	100774387	C3	Y	6/14/2017	6/19/2017	7/11/2017	22
18	100774388	C3	Y	6/18/2017	6/19/2017	7/11/2017	22
19	100774386	C3	Y	6/13/2017	6/19/2017	7/11/2017	22
20	100773765	C3	N	6/14/2017	6/19/2017	7/10/2017	21
21	100773764	C3	N	6/13/2017	6/19/2017	7/10/2017	21
22	100773766	C3	N	6/18/2017	6/19/2017	7/10/2017	21
23	100774390	C3	Y	6/20/2017	6/26/2017	7/11/2017	15
24	100774389	C3	Y	6/19/2017	6/26/2017	7/11/2017	15
25	100788628	C4	N		9/11/2017	9/25/2017	14
26	100773767	C3	N	6/19/2017	6/26/2017	7/10/2017	14
27	100773769	C3	N	6/20/2017	6/26/2017	7/10/2017	14
28	100779950	C3	N	7/15/2017	7/17/2017	7/31/2017	14
29	100779954	C3	Y	7/15/2017	7/17/2017	7/31/2017	14
30	100790888	C3	N	9/18/2017	9/25/2017	10/8/2017	13
31	100780785	C4	N		7/25/2017	8/6/2017	12
32	100756826	C4	N		4/10/2017	4/18/2017	8
33	100756818	C3	N	3/18/2017	4/10/2017	4/18/2017	8
34	100774391	C3	Y	6/26/2017	7/3/2017	7/11/2017	8
35	100774393	C3	Y	6/28/2017	7/3/2017	7/11/2017	8
36	100774394	C3	Y	7/2/2017	7/3/2017	7/11/2017	8
37	100774392	C3	Y	6/27/2017	7/3/2017	7/11/2017	8
38	100773771	C3	N	6/27/2017	7/3/2017	7/10/2017	7
39	100773773	C3	N	7/2/2017	7/3/2017	7/10/2017	7
40	100773772	C3	N	6/28/2017	7/3/2017	7/10/2017	7
41	100773770	C3	N	6/26/2017	7/3/2017	7/10/2017	7
42	100768934	C4	N		6/10/2017	6/12/2017	2
43	100774395	C3	Y	7/6/2017	7/10/2017	7/11/2017	1