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IN THE SUPERIOR COURT OF WASHINGTON
FOR THE COUNTY OF THURSTON

STATE OF WASHINGTON ex rel. GLEN MORGAN,
Plaintiff
v.
PEOPLE FOR THURSTON COUNTY – THURSTON-LEWIS-MASON LABOR COUNCIL SPONSOR (a political committee), JAY MANNING (Chair),
Defendant

No.

COMPLAINT

COMES NOW the STATE OF WASHINGTON as related to GLEN MORGAN, a citizen acting under the authority of RCW 42.17A.765, by and through his undersigned attorney JUSTIN KOVER, to bring this Complaint for causes of action related to violations of the Campaign Disclosure and Contribution Act, RCW 42.17A.

INTRODUCTION

In the final weeks of the 2016 campaign season, Jay Manning took steps to channel money from JZ Knight into the race for two Thurston County Commissioner seats. JZ Knight is a well-documented proponent of racist statements against Mexicans, Catholics, Gays, Jews, and other minority groups. Manning, as Chair of the political committee People for Thurston County – Thurston-Lewis-Mason Labor Council PAC, committed several violations of the Campaign

1 Disclosure and Distribution Act, RCW 42.17A, in an effort to shield his group from the sort of
2 association with bigotry that caused the Washington State Democratic Party, and several other
3 candidates, to return JZ Knight's racist cult money in 2012. The mindful purpose behind these
4 violations was to create the appearance to the voters of Washington that his political committee
5 was sponsored by workers' unions, rather than a racist hate cult.

6 I. NATURE OF ACTION

- 7 1. On October 20, 2016, People for Thurston County -- Thurston-Lewis-Mason Labor
8 Council Sponsor [sic] was formed by Jay Manning. See *Exhibit A – C-IPC form for*
9 *P4T*.
- 10 2. People for Thurston County -- Thurston-Lewis-Mason Labor Council Sponsor is a
11 political committee as defined in RCW 42.17A.005(37).
- 12 3. Plaintiff Glen Morgan has obtained standing to carry this case forward for the State
13 of Washington in accordance with the citizen enforcement process set forth in RCW
14 42.17A.765(4). See *Exhibit B – 45-day and 10-day notice pursuant to RCW*
15 *42.17A.765(4)*.
- 16 4. This Complaint details allegations which include violations of RCW 42.17A.205
17 through RCW 42.17A.425, *inter alia*, as well as relevant sections of WAC Title
18 390.

19 II. JURISDICTION AND VENUE

- 20 1. This Court has jurisdiction under the Campaign Disclosure and Distribution Act,
21 RCW 42.17A, which authorizes a person to bring a citizen's action in the name of
22 the State of Washington to enforce the Act. See RCW 42.17A.765(4).

- 1 2. Venue is proper under RCW 4.12.020 because the allegations of campaign
2 disclosure violations occurred in Thurston County, WA.

3 III. PARTIES

- 4 1. Plaintiff the State of Washington appears as related to Plaintiff Glen Morgan as
5 described in RCW 42.17A.765(4).
6 2. Plaintiff Glen Morgan, a private individual, appears as related to the State of
7 Washington having obtained standing to bring this action as described in RCW
8 42.17A.765(4). See *Exhibit B*.
9 3. Defendant "People for Thurston County (Thurston-Lewis-Mason Labor Council
10 Sponsor)" (P4T) is a political committee as defined in RCW 42.17A.005(37).
11 4. Defendant Jay Manning is the Chair of People for Thurston PAC. See *Exhibit A*.

12 IV. STATEMENT OF FACTS

- 13 1. RCW 42.17A declares as a matter of public policy "[t]hat political campaign
14 and lobbying contributions and expenditures be fully disclosed to the public and that
15 secrecy is to be avoided." RCW 42.17A.001. Further, the statute provides that the
16 provisions of the law "shall be liberally construed to promote complete disclosure of
17 all information respecting the financing of political campaigns...." *Id.*
18
19 2. On October 20, 2016, Defendant P4T filed form C-1PC (Committee Registration)
20 with the state Public Disclosure Commission identifying itself as a committee
21 supporting Jim Cooper & Kelsey Hulse. See *Exhibit A*.
22 3. State law restricts the ability of political committees to make contributions in
23 excess of five thousand dollars to candidates within twenty-one days of a general
24

1 election. RCW 42.17A.420(1). State law defines contributions to include
2 expenditures made in cooperation, consultation, or concert with, or at the request or
3 suggestion of, a candidate, and the person or persons named on the candidate's
4 registration form who direct expenditures on behalf of the candidate, or their agents.
5 RCW 42.17A.005(13)(a)(ii). State law further defines contributions as the financing
6 by a committee of the dissemination, distribution, or republication, in whole or in
7 part, of broadcast, written, graphic, or other form of political advertising or
8 electioneering communication prepared by a candidate, a political committee, or its
9 authorized agent. RCW 42.17A.005(13)(a)(iii). WAC 390-05-210 (2).

10 4. During the 21-day window and by their own admission, P4T made \$17256.74 in
11 expenditures promoting Cooper's campaign and \$20,270.01 in expenditures
12 promoting Hulse's campaign. See *Exhibit C*. On information and belief, because
13 these expenditures were made in cooperation, consultation, or concert with, or at the
14 request or suggestion of, candidates Jim Cooper and Kelsey Hulse, and the person
15 or persons named on their candidate registration forms who direct expenditures on
16 their behalf, or their agents – these amounts are well in excess of applicable limits.
17 Many of these mailers also included the republication of graphic forms of political
18 advertising prepared by the candidates P4T were supporting (Hulse and Cooper).
19 As such, P4T's mailers constituted a contribution to the candidate in excess of
20 applicable limits. This constitutes a violation of state law. See *Exhibits D and I*.

21
22 5. State law requires that political committees include the name of any "sponsor" in
23 their committee name when they file their C-1PC registration form. RCW
24

1 42.17A.205(5). WAC 390-16-011A. State law defines “sponsor” as any entity
2 which donates 80% or more of the total contributions received by the committee.
3 RCW 42.17A.005 (42)(b)(i). State law further requires that any material change in
4 information previously submitted in a C-1PC (such as its sponsor/name) shall be
5 reported to the Commission within the 10 days following the change via an
6 amendment to the original form. RCW 42.17A.205(4).

7 a. The name of the group that initially contributed over 80% of the money received
8 by P4T was Thurston-Lewis-Mason Labor Council. However, on their C-1PC, P4T
9 illegally identified the wrong contributor as the sponsor. P4T identifies the sponsor
10 as "Thurston-Lewis-Mason Labor Council [sic]". This is likely a typo, however
11 when it was brought to the attention of the committee they failed to amend their C-
12 1PC. See *Exhibits A and H*.

13 b. The committee initially listed (on 10/10/2016) Thurston-Lewis-Mason Labor
14 Council as the committee’s sponsor on form C-1PC. After JZ Knight contributed
15 \$54,000 to P4T on 10/12/2016, she became the new sponsor of the committee. This
16 is because the total contributions she made to the committee on 10/12/2016
17 constituted 93% of the total contributions received by P4T. See *Exhibit N -*
18 *10/12/2016 C-3 form and 10/18/2016 C-4 form*. As such, P4T had 10 days to
19 change the committee name to include JZ Knight as the new committee sponsor.
20 However, they never did so, even after having received a complaint from Mr.
21 Morgan citing the law. On information and belief, Knight is the politically toxic
22 leader of a local hate cult and P4T wanted to avoid including Knight as a sponsor in
23
24

1 the committee name because it would have caused public outrage. See *Exhibits A,*
2 *F, G.*

- 3
- 4 6. State law requires that committees which receive earmarked contributions complete
5 a report, entitled "Earmarked Contributions," on a form labeled by the commission
6 as "Special Report E" that identifies the name and address of the person who made
7 the contribution, the candidate or political committee for whose benefit the
8 contribution is earmarked, the amount of the contribution, and the date that the
9 contribution was received; and mail or deliver to the commission and the candidate
10 or political committee benefiting from the contribution a copy of the "Earmarked
11 contributions" report within two working days of receipt of the contribution. RCW
12 42.17A.270.

13 An earmarked contribution is defined as any contribution given to an intermediary
14 or conduit, either a political committee, candidate or third party, with a designation,
15 instruction, or encumbrance, whether direct or indirect, express or implied, oral or
16 written, which is intended to result in or which does result in all or any part of the
17 contribution being made to or for the promotion of certain candidates, state
18 officials, or ballot propositions. WAC 390-16-240 (1).

- 19
- 20 7. On information and belief, JZ Knight and other contributors donated money to the
21 PAC with the express purpose of promoting Kelsey Hulse and Jim Cooper in their
22 bids for the Thurston County Commission. As such, JZ Knight's contribution was
23 an earmarked contribution, but was not reported as such. Moreover, P4T failed to
24

1 mail or deliver to the commission and the candidates benefiting from the
2 contribution a copy of the "Earmarked contributions" report within two working
3 days of receipt of the contribution. As such, P4T violated state law. See *Exhibit J*.

4
5 8. State law requires that written political advertising contain the committee's full
6 name and address in a sponsor statement. RCW 42.17A.320 (1).

7
8 9. P4T's C-1PC form indicates that the committee name is "People for Thurston
9 County (Thurston-Lewis-Mason Labor Council Sponsor)". None of the
10 committee's mailers contain this name in the sponsor statement. Instead, they
11 contain the name "People for Thurston County PAC". This is a violation of state
12 law. See *Exhibit H*.

13
14 10. State law requires that political committees identify any person who alone or in
15 conjunction with other persons makes, directs, or authorizes contribution,
16 expenditure, strategic, or policy decisions on behalf of the committee as officers on
17 their C-1PC form. RCW 42.17A.205, WAC 390-05-245. State law further requires
18 that accurate names, addresses, and titles of its officers be included on the
19 committee's C-1PC. RCW 42.17A.205(2)(c).

20 a. On P4T's C-1PC, the listed address for Jay Manning (a committee officer) was
21 4829 Cooper Point Road, Olympia, WA. By defendant's own admission, the
22 address listed for Manning was incorrect. Manning's actual address is 4928
23
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1 Cooper Point Road, Olympia, WA. As of the filing of this complaint, P4T has
2 failed to file an updated C-1PC to rectify this error. See *Exhibits A and D*.

3
4 b. Defendant P4T's form C-1PC identified Jay Manning as the committee's sole
5 officer. On information and belief, there are other people who served as
6 committee officers who were not listed as officers on the C-1PC form in violation
7 of state law. These unlisted committee officers include, but are not limited to,
8 NWP Consulting, Christian Sinderman, and JZ Knight. See *Exhibits A and D*.

9
10 11. State law requires that committees prepare and deliver to the Commission a special
11 report when a contribution or aggregate of contributions totals one thousand dollars
12 or more, is from a single person or entity, and is received during a special reporting
13 period. RCW 42.17A.265(1). This form is designated as a "LMC form"
14 (abbreviation of Last Minute Contribution) by the Commission. The period 21 days
15 preceding a general election is considered a special reporting period. RCW
16 42.17A.265(4)(b).

17
18 12. P4T failed to report the following last minute contributions within the 48-hour time
19 limit on an LMC form, as required by law:

20 a. A contribution of \$1000 from Thurston Environmental Voters that was received on
21 10/18/2016. See *Exhibit J*.

22 b. A contribution of \$1000 from Washington Conservation Voters Action Fund that
23 was received on 10/27/2016. *Id.*

1 13. State law requires that the sponsors of independent expenditures and electioneering
2 communications must electronically report to the commission within twenty-four
3 hours of, or on the first working day after, the date the independent expenditure or
4 electioneering communication is first broadcast, transmitted, erected, distributed, or
5 otherwise published. RCW 42.17A.255. RCW 42.17A.305. WAC 390-18-060. The
6 form for filing this report to the commission is designated as form C-6, per WAC
7 390-16-060.

8 14. P4T's first mailer was received by voters on or about Monday, 10/17/2016. Because
9 it is impossible to mail on Sunday, it must have been sent on or before Saturday,
10 10/15/2016. Depending on the date this was sent, the C-6 form should have been
11 submitted no later than the end of Monday, 10/17/2016. Because of P4T's failure to
12 report electronically in a timely fashion, voters were unable view the C-6 form after
13 having received the mailer on Monday 10/17/2016. However, P4T did not submit
14 their C-6 form until 10/20/2016 after having received notice of the Morgan
15 complaint. By Defendant's own admission, the C-6 for P4T's first mailer was
16 submitted past the statutory deadline. See *Exhibit D*.

17
18 15. State law requires that – if a candidate has expressed a party or independent
19 preference on their declaration of candidacy -- that party or independent designation
20 shall be clearly identified in electioneering communications, independent
21 expenditures, or political advertising that mention the name of the candidate
22 supported or opposed. RCW 42.17A.320 (1).

1 16. In two of their mailers, P4T failed to identify the partisan affiliation of Jim Cooper
2 or Kelsey Hulse (which P4T supported), or John Hutchings or Gary Edwards
3 (which P4T opposed). By Defendant's own admission, P4T failed to abide by this
4 requirement. As such, P4T violated state law. See *Exhibit E*.

5
6 17. State law requires that political committees identify any person who alone or in
7 conjunction with other persons makes, directs, or authorizes contribution,
8 expenditure, strategic, or policy decisions on behalf of the committee as officers on
9 their C-1PC form. RCW 42.17A.205, WAC 390-05-245. State law further requires
10 that accurate names, addresses, and titles of its officers be included on the
11 committee's C-1PC. RCW 42.17A.205(2)(c).

12
13 a. On P4T's C-1PC, the listed address for Jay Manning (a committee officer) was
14 4829 Cooper Point Road, Olympia, WA. By defendant's own admission, the
15 address listed for Manning was incorrect. Manning's actual address is 4928
16 Cooper Point Road, Olympia, WA. As of the filing of this complaint, P4T has
17 failed to file an updated C-1PC to rectify this error. See *Exhibits A and D*.

18
19 b. Defendant P4T's form C-1PC identified Jay Manning as the committee's sole
20 officer. On information and belief, there are other people who served as
21 committee officers who were not listed as officers on the C-1PC form in violation
22 of state law. These unlisted committee officers include, but are not limited to,
23 NWP Consulting, Christian Sinderman, and JZ Knight. See *Exhibits A and D*.

1
2 18. State law prohibits expenditures from being made or incurred by any political
3 committee unless authorized by the person or persons named on the committee's C-
4 1PC registration form. RCW 42.17A.425.

5 On information and belief, NWP Consulting made numerous unauthorized
6 expenditures on behalf of P4T, despite not being listed on the committee's C-1PC
7 registration form. This constitutes a violation of state law. See *Exhibits A and J*.

8
9 19. State law requires that political committees file regular, accurate, timely reports of
10 monetary contributions received on a form titled "Cash Receipts, Monetary
11 Contributions". RCW 42.17A.235, RCW 42.17A.240. This form is designated as
12 form C-3 by the Commission, pursuant to WAC 390-16-031. State law further
13 requires that political committees file the C-3 report containing all contributions
14 received prior to the date the C-1PC registration form was submitted on the same
15 day that the committee files their statement of organization with the Commission.
16 RCW 42.17A.235(1).

17 20. P4T submitted its C-1PC form with the Commission on 10/10/2016. According to
18 available records, P4T had received a contribution from Thurston-Lewis-Mason
19 Labor Council on 10/7/2016, prior to having registered with the Commission. As
20 such, the due date for submitting this report to the Commission was 10/10/2016.
21 However, this report was not filed with the Commission until 10/11/2016, in
22 violation of state law. See *Exhibit L*.

1 21. State law requires that committees file regular, timely, accurate reports disclosing
2 expenditures, in-kind contributions, debts & obligations, and pledges. RCW
3 42.17A.235(2). The report disclosing expenditures, in-kind contributions, debts &
4 obligations, and pledges is entitled "Campaign Summary, Receipts and
5 Expenditures" and is designated by the Commission as form C-4, pursuant to WAC
6 390-16-041. This report is due monthly until the twenty-first day of the month
7 before an election at which time the report is due twenty-one days before the
8 election, seven days before the election, and on the tenth day of the month
9 following the election. An expenditure is defined to include "a promise to pay...."
10 RCW 42.17A.005(20). For the purposes of this chapter, agreements to make
11 expenditures, contracts, and promises to pay may be reported as estimated
12 obligations until actual payment is made." *Id.* Further, committees must properly
13 break down their expenditures to include certain sub-vendor information. WAC
14 390-16-205. See also *Exhibit N*.

15 **a. Failure to Breakdown Expenditures**

16 P4T failed to breakdown the following expenditures as required by law:

- 17 1. Expenditure to NWP Consulting on 10/20/16 for "PRINTING AND
18 MAILING HULSE MAILING". (Failed to breakdown amount paid to Capital City
19 Press for printing and amount paid to Ann Rhodes for design). See *Exhibit I*.
- 20 2. Expenditure to NWP Consulting on 10/20/16 for "PRINTING AND
21 MAILING COOPER MAILER". (Failed to breakdown amount paid to Capital City
22 Press for printing and amount paid to Ann Rhodes for design). *Id.*

1 3. Expenditure to NWP Consulting on 10/27/16 for “DESIGN, PRINTING
2 AND MAILING SERVICE”. (Failed to breakdown amount paid to Capital City
3 Press for printing and amount paid to Ann Rhodes for design). *Id.*

4 4. Expenditure to NWP Consulting on 10/31/16 for “PRINTING DESIGN
5 AND MAILING SERVICE FOR HULSE PEICE [sic]”. (Failed to breakdown
6 amount paid to Capital City Press for printing and amount paid to Ann Rhodes for
7 design). *Id.*

8 5. Expenditure to NWP Consulting on 10/31/16 for “PRINTING, DESIGN
9 OF COOPER MAILER”. (Failed to breakdown amount paid to Capital City Press
10 for printing and amount paid to Ann Rhodes for design). *Id.*

11 6. On information and belief, NWP Consulting purchased three unique, high
12 resolution stock photography images used on three of P4T’s mailers. See *Exhibit J.*

13
14 **b. Unreported in-kind contributions, expenditures, debts.**

15 1. During the month of January 2017, P4T received legal services from the
16 offices of Schwerin Campbell Barnard Iglitzin & Lavitt LLP. They were required to
17 report these services in one of the following ways: as an in-kind contribution, an
18 expenditure made by the committee, or a debt that the committee would eventually
19 have to pay. P4T was required to report this activity on their C4 form by
20 2/10/2017. The C-4 form was filed 3 days late on 2/13/2017, and did not include
21 this activity. This is a violation of state law. See *Exhibits K and L.*

22 2. During the month of November 2016, P4T received legal services from
23 the offices of Schwerin Campbell Barnard Iglitzin & Lavitt LLP. They were
24

1 required to report these services in one of the following ways: as an in-kind
2 contribution, an expenditure made by the committee, or a debt that the committee
3 would eventually have to pay. P4T was required to report this activity on their C4
4 form by 12/12/2016, but failed to do so. See *Exhibit I*.

5
6 **c. Unreported pledges.**

7 1. P4T had legal debt related to complaints filed by Mr. Morgan. On
8 information and belief, JZ Knight pledged money to P4T to pay for these legal
9 debts. This pledge has not been reported by P4T. See *Exhibit J*.

10 2. On information and belief, JZ Knight pledged to contribute to P4T prior to
11 its formation as a political committee, however this was not reported as a pledge on
12 the day P4T filed its C-1PC, as required by state law. RCW 42.17A.235(1). See
13 *Exhibit D*.

14 3. According to Defendant, Washington Conservation Voters pledged to
15 contribute between \$1000 - \$2000 to P4T. On information and belief, this pledge
16 occurred on or before 10/17/2016. As such, this pledge should have been reported
17 no later 10/18/2016, however P4T failed to do this. *Id.*

18 **d. Unreported Debt.**

19 Throughout much of the campaign, Defendants reported campaign expenditures based on the
20 date the campaign received and paid the invoices for goods and services. Defendants did not
21 disclose certain orders placed, debts or obligations which were incurred during one reporting
22 period and yet were paid for in a subsequent reporting period. Defendants incurred debts and
23 obligations in a reporting period that were not fully paid until subsequent reporting periods. As
24

1 such, Defendants knew or should have known that they were required to report the orders placed,
2 debts or obligations on Schedule B to a C-4 report to the extent they were reasonably anticipated
3 to exceed \$250 in value. On information and belief, the orders placed, debts and obligations that
4 Defendants failed to report include: See *Exhibit D*.

5 1. NWP Consulting (design, printing, mailing): expenditure for \$8,286.51 for
6 “PRINTING AND MAILING HULSE MAILING”, the transaction was reported as
7 having occurred on 10/20/2016 on a C-4 form dated 10/31/2016.

8 The C-4 filed 10/18/2016 by the PAC indicates that P4T reported having paid the
9 postage associated with this mailer being sent on 10/16/2016. As such, Defendant
10 should have also reported the related services from NWP as debt on date the order
11 was placed which was on or before 10/16/2016. Per state law, the due date for
12 reporting this debt was 10/18/2016. As such, this disclosure was 13 days late.

13 2. NWP Consulting (design, printing, mailing): expenditure for \$6,364.43 for
14 “PRINTING AND MAILING COOPER MAILER”, the transaction was reported as
15 having occurred on 10/20/2016 on a C-4 form dated 10/31/2016.

16 The C-4 form filed 10/18/2016 by the PAC indicates that P4T reported having paid
17 the postage associated with these mailers as being sent on 10/16/2016. As such,
18 Defendant should have also reported the related services from NWP as debt on date
19 the order was placed which was on or before 10/16/2016. Per state law, the due date
20 for reporting this debt was 10/18/2016. As such, this disclosure was 13 days late.

21 3. Publisher’s Mailing Service (postage, mailing): expenditure for \$8676.10
22 for “POSTAGE AND MAILING SERVICE JOINT PIECE [sic]”, the transaction
23 was reported as having occurred on 10/20/2016 on a C-4 form dated 10/31/2016.
24

1 On information and belief, Defendant placed this order on or before 10/17/2016.

2 As such, the due date for reporting this debt was 10/18/2016, per state law. As such,
3 this disclosure was 13 days late.

4 4. NWP Consulting (design, printing, mailing): expenditure for \$10,104.04
5 for "DESIGN, PRINTING AND MAILING SERVICE", the transaction was
6 reported as having occurred on 10/27/2016 on a C-4 form dated 10/31/2016.

7 On information and belief, Defendant placed this order on or before 10/17/2016.

8 As such, the due date for reporting this debt was 10/18/2016, per state law. As such,
9 this disclosure was 13 days late.

10 5. NWP Consulting (design, printing, mailing): expenditure for \$4240.63 for
11 "PRINTING DESIGN AND MAILING SERVICE FOR HULSE PIECE [sic]", the
12 transaction was reported as having occurred on 10/31/2016 on a C-4 form dated for
13 that day.

14 On information and belief, Defendant placed this order on or before 10/17/2016.

15 As such, the due date for reporting this debt was 10/18/2016, per state law. As such,
16 this disclosure was 13 days late.

17 6. Publisher's Mailing Service (postage, mailing): expenditure for \$3617.58
18 for "POSTAGE FOR HULSE MAILING", the transaction was reported as having
19 occurred on 10/31/2016 on a C-4 form dated for that day.

20 On information and belief, Defendant placed this order on or before 10/17/2016.

21 As such, the due date for reporting this debt was 10/18/2016, per state law. As such,
22 this disclosure was 13 days late.

1 7. NWP Consulting (design, printing, mailing): expenditure for \$3533.38 for
2 “PRINTING, DESIGN OF COOPER MAILER”, the transaction was reported as
3 having occurred on 10/31/2016 on a C-4 form dated for that day.

4 On information and belief, Defendant placed this order on or before 10/17/2016.

5 As such, the due date for reporting this debt was 10/18/2016, per state law. As such,
6 this disclosure was 13 days late.

7 8. Publisher’s Mailing Service (postage, mailing): expenditure for \$3064.48
8 for “POSTAGE AND MAILING SERVICE FOR COOPER MAILER”, the
9 transaction was reported as having occurred on 10/31/2016 on a C-4 form dated that
10 day.

11 On information and belief, Defendant placed this order on or before 10/17/2016.

12 As such, the due date for reporting this debt was 10/18/2016, per state law. As such,
13 this disclosure was 13 days late.

14
15 **V. CLAIM FOR RELIEF**

16 The State re-alleges and incorporates by reference all the factual allegations contained
17 in the preceding paragraphs, and based on those allegations makes the following claims:

18 Claim #1: The State asserts that Defendant made contributions to candidates in excess of
19 five thousand dollars to candidates within twenty-one days of a general election, in
20 violation of RCW 42.17A.420(1).

21
22 Claim #2: The State asserts that Defendant failed to include the name of its “sponsor” in
23 their committee name when they filed their C-1PC registration form in violation of RCW
24

1 42.17A.205(5). State further asserts that Defendant failed to amend its C-1PC registration
2 form to include a change of material within the 10 days following the change in violation
3 of RCW 42.17A.205(4).
4

5 Claim #3: The State asserts that Defendant failed to report an ear-marked contribution in
6 violation of RCW 42.17A.270.
7

8 Claim #4: The State asserts that Defendants failed to accurately disclose the committee's
9 full name and address on a piece of written political advertising in violation of RCW
10 42.17A.320 (1).
11

12 Claim #5: The State asserts that Defendant, in violation of RCW 42.17A.265(1) failed to
13 timely report having received a last-minute contribution.
14

15 Claim #6: The State asserts that Defendant failed to timely file an electronic independent
16 expenditure/electioneering communication report, in violation of RCW 42.17A.255 and
17 RCW 42.17A.305.
18

19 Claim #7: The State asserts that Defendant failed to accurately identify the partisan
20 affiliation of candidates identified in political advertising, in violation of RCW
21 42.17A.320 (1).
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1 Claim #8: The State asserts that Defendant failed to identify committee officers on their
2 C-1PC form in violation of RCW 42.17A.205 and WAC 390-05-245. Additionally,
3 Defendant failed to include the accurate names, addresses, and titles of its officers on its
4 C-1PC form in violation of RCW 42.17A.205(2)(c).

5
6 Claim #9: The State asserts that Defendants illegally allowed expenditures to be made or
7 incurred on their behalf by persons who were not named on the committee's C1-PC
8 registration form.

9
10 Claim #10: The State asserts that Defendants failed to file the C-3 report containing all
11 contributions received prior to the date the C-1PC registration form was submitted on the
12 same day that the committee files their statement of organization with the Commission in
13 violation of RCW 42.17A.235(1).

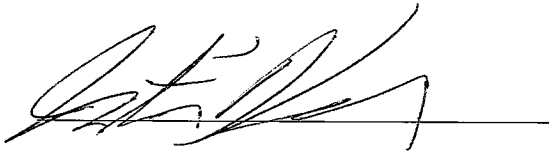
14
15 Claim #11 The State asserts that Defendant, in violation of RCW 42.17A.235(2) and
16 .240, failed to timely and accurately report contributions, expenditures made, in-kind
17 contributions received, pledges and orders placed, debts and obligations incurred, with
18 the total amount of violations to be proven at trial. State further alleges that Defendant
19 failed to properly break down expenditures in violation of WAC 390-16-205.

20
21 **VI. PRAYER FOR RELIEF**

22 WHEREFORE, the State requests the following relief as provided by law:
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- 1 1. For such remedies as the court may deem appropriate under RCW 42.17A.750,
2 including but not limited to imposition of a civil penalty, all to be determined at trial;
- 3 2. For all costs of investigation and trial, including reasonable attorneys' fees, as
4 authorized by RCW 42.17A.765(5);
- 5 3. For temporary and permanent injunctive relief, as authorized by RCW
6 42.17A.750(1)(h); and;
- 7 4. For such other legal and equitable relief as this Court deems appropriate.

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10 DATED this 9th day of May, 2017.

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13 JUSTIN KOVER, WSBA #51117

14 Attorney for the State of Washington ex. rel. Glen Morgan
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