

Complaints made by Glen Morgan

Disclaimer: This document does not constitute legal advice. This merely represents a compilation of some of the common complaints levelled by Glen Morgan.

1. Campaigning on public time.

This can range from the more benign to the more prolific. Glen has filed [complaints](#) against individuals who are public employees who share campaign events (like fundraisers) on Facebook if they were shared during normal business hours. If you are a public employee, this type of complaint could be avoided by posting at night or just not posting at all from your personal account.

2. Website purchase.

All websites have a price. If you have a website, Glen may [complain](#) that you failed to include an expenditure or in-kind donation regarding procurement of the domain name as well as the cost for website design. Renewals and purchases are both publicly available information that is easy for an on-looker to sleuth out.

3. Graphic design.

Same as above, if you do fancy graphic design, Glen may [complain](#) that there was no accounting for how it was procured, in-kind, bought, or otherwise.

4. Photography.

If you have nice, professional looking photos on your website, Glen may [complain](#) that you failed to include an expenditure or in-kind donation regarding procurement of the photos.

5. Retirement accounts are assets.

Even your PERS or TERS accounts can be a source of a [complaint](#). If you worked for the state at any point in time, visit the DRS website and try to log-in to view your balance so your F1 is accurate.

6. Same day C3/C4 filing

This is a very common [complaint](#) raised by Glen. Glen claims you have to file your C3 and C4 the same day you file your C1. The statute here is very unclear. It says you must file a C3 and C4 the day your treasurer is designated. But my consultant says that they must be filed on the same day as the C1 *only if* you raised \$200 in the preceding 2 weeks. Safest to just file it the

day you do the C1 except this isn't always possible because you have to get your filer ID to file in ORCA.

7. File donation/expenditure reports on time

This is a simple complaint. If your C3 and C4 are even a day late, Glen will file a [complaint](#) for them being "well beyond" the deadline.

8. When purchasing just one item, it must be specific

The Jim Cooper "snacks" thing. Absolutely ridiculous complaint.

9. You must file a C1 within 2 weeks of a website purchase

Glen has [complained](#) that once someone buys a URL along the lines of "vote4wilson.com" that they have then begun campaigning and have to file their C1, F1, C3, and C4 within 2 weeks. I haven't seen an example where he has leveled such a complaint against someone who just bought their name as a URL and did not contain "vote" or "elect" in the URL.

10. Document the filing fee

Everyone has to pay a filing fee so if you do not document it, Glen may file a [complaint](#).

11. List the vendor who conducts printing on the expenditure report

Glen sometimes complains that reports are not specific enough because they don't list the vendors for printing on the expenditure reports.

12. Report occupation and employer

If they donate more than \$100, [you must report the individual's' occupation and employer](#).

13. Keep receipts and records for 5 years

Your books have to be complete and inspectable for 5 years. Glen has [complained](#) when candidates have not kept their books for that period of time.

14. Don't forget the "paid for" line on every website, including the donation purveyor

Glen may [complain](#) if the website lacks a "paid for" line at the bottom. This should also be somewhere on your donation purveyor's form (square, anedot, etc.)

15. Specificity on expenditures

RCW 42.17A.235 prescribes timelines for reporting contributions and expenditures. Glen has [complained](#) that these are not specific enough but statute does not provide guidance for the level of specificity:

RALPH DANA L 4/8/2016 \$97.00 KENT WA 98064 GO DADDY -- Too vague: fails to identify what the payment to GoDaddy was made for.

RALPH DANA L 4/8/2016 \$70.00 KENT WA 98064 USPS -- Too vague: fails to identify what was purchased from USPS.

RALPH DANA L 4/8/2016 \$50.45 KENT WA 98064 STAPLES - KICKOFF -- Too vague: fails to identify what was purchased at staples for the kickoff.

A bit of additional specificity will make it easier to get this kind of complaint dismissed but he may make the complaint no matter how specific.

16. Boards of corporations including public corporations

Even if it is a public corporation, you must [disclose](#) if you are a corporate officeholder.

17. Surplus transfer

Glen may [complain](#) if a direct contribution is made from a campaign committee to another campaign committee. For instance, if you want to transfer funds from a previous cycle to your new campaign. Those funds must first be transferred to a surplus account.

18. Reimbursement must be for campaign use

If you rent a PO Box but list your home address for the campaign, Glen may [complain](#) that you are using the PO Box for personal use because it was not registered for the campaign. He will complain if there is any cross contamination between the campaign and personal use.

19. Committee officers declared

Glen often makes [complaints asserting](#) that candidates have failed to list individuals as committee officers. WAC 390-05-245 defines committee officer as “any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee.” Glen has asserted that this can encompass [political consultants \(and their businesses\)](#), campaign managers, and treasurers. He usually focuses on the ability of the individual to make expenditure decisions, which is one of the lowest barrier qualifications for the committee. If someone has something as simple as a reimbursement who is not a committee officer, he may then file a [complaint](#) based on the

expenditure. My consultant told me that the PDC has dismissed all the complaints about listing a consultant as a committee officer.

20. Campaign management in-kind contributions

If you have a volunteer campaign manager who has been paid before, Glen may file a [complaint](#) for failing to report this as an in-kind donation.

21. Videos produced by a city regarding candidates?

Glen has [complained](#) that a municipality that creates a video-voters-guide should result in an in-kind donation and that linking to the video constitutes a misuse of public resources by the campaign. I would imagine that this gets dismissed but it has not been ruled on yet.

22. Reporting a mailing list as an in-kind donation

Glen has [complained](#) that when an individual does a mailer that they must also file an in-kind or expenditure for how the mailing list was obtained - whether it be from a private company or from the state or local party.

23. Campaign debt

If it appears that you have an ongoing contractual relationship, for instance with a political consultant, Glen may [complain](#) if you do not file that as a debt.

24. Income if an elected official

Don't forget to disclose that you receive [income](#) if you are already an elected official.

25. Addresses for expenditures.

Glen has filed [complaints](#) when an address for an expenditure was not included pursuant for 42.17A.240.

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