

File a Formal Complaint - Glen Morgan

Glenmorgan89 reported 11 hours ago (Mon, 6 Mar at 1:01 AM) via Portal Meta

To Whom it May Concern --

It has come to my attention that John Wilson, a 2015 candidate for King County Assessor -- has committed numerous violations of **RCW 42.17A**. It should be noted that Bailey Stober is his Director of Communications. This is a relevant fact to this complaint because Bailey Stober is a serial violator of campaign finance laws (see attached **PDC Case #14-017** for reference). Bailey Stober was extensively involved in Wilson's campaign and it appears Stober's willingness to violated campaign finance law impacted the Wilson campaign as well.

1) Failure to timely file C1 (Violation of RCW 42.17A.205)

John Wilson became a candidate per **RCW 42.17A.005** on 10/4/14 when he purchased the domain "www.Wilson4Assessor.com". (See attachment)

As such, Wilson was obligated to file his C1 within two weeks of making this purchase.

Wilson should have filed his C1 by 10/18/14, however he failed to file until 2/9/15, well past the statutory deadline.

2) Failure to timely file C3 & C4 reports on day C1 is filed, failure to report in-kind contribution. (Violation of RCW 42.17A.235(1))

State law requires that candidates submit reports containing all contributions received and expenditures made on the same day they submit their statement of registration (C1).

Unfortunately, Wilson has completely failed to report the in-kind contribution of his website domain purchase.

Additionally, he also failed to report the expenditure for the PO Box listed on his C1: "PO Box 1491". This likely cost ~\$80.

3) Violation of RCW 42.17A.240, WAC 390-16-037 -- Failure to report occupation and employer information for donors over \$100.

Washington's campaign finance law requires a campaign to timely report contributions received. The information required to be disclosed includes the name and address of the source of contributions that exceed \$25 in the aggregate, and the employer and occupation of any individual contributor giving more than \$100 in the aggregate.

Unfortunately, Wilson failed to include this information for the following 4 contributions:

JARAMILLO CHRISTINA 10/28/2015 \$200.00 G SEATTLE WA 98136
ROSENBERGER ROBERT 11/19/2015 \$200.00 G SEATTLE WA 98124
DAMS AL 11/19/2015 \$125.00 G CARNATION WA 98014
DAMS MARIE 11/19/2015 \$125.00 G CARNATION WA 98014

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

a) According to the PDC, the C4 for the time period of 10/13/15 to 10/26/15 was due on 10/27/15.

Wilson's original report failed to include the accurate value of expenditures made of \$50 or less: Wilson reported \$259.02 but it was actually \$262.02.

Unfortunately, Wilson failed to file an accurate C4 until 12/10/15, well past the statutory deadline.

b) According to the PDC, the C4 for the time period of 9/1/15 to 10/12/15 was due on 10/13/15.

Wilson's original report failed to include the accurate value of an expenditure (allegedly for "food") made to Amber Seattle on 10/10/15.

The original report stated that the expenditure was for \$158.60, however it was actually \$178.60.

The accurate report was not submitted until 10/20/15, well past the statutory deadline.

c) According to the PDC, the C3 for the time period of 3/1/15 to 3/31/15 until 4/10/15.

Wilson's original report failed to include the true identity of a donor. A \$950 contribution from Michele Sharar (CFO of Emerald City Athletics) was maliciously attributed to Michael Grossman (a communications consultant).

The Wilson campaign effectively obscured the true donor of this \$950 contribution for nearly 3 months.

The PDC should investigate whether or not Wilson intentionally falsified these reports, which would be a class C felony pursuant to **RCW 42.17A.750 (2)(c)**.

5) 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. 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.

Unfortunately, Wilson failed to report the following 49 expenditures as debt on previous C4s:

Vendor	Date	Amount	Description
AMBER SEATTLE	2015-11-19		283.4 FOOD
CAMPAIGN COMPLIANCE SOLUTIONS	2015-09-02		500 COMPLIANCE CONSULTING
CAMPAIGN COMPLIANCE SOLUTIONS	2015-10-03		500 COMPLIANCE CONSULTING
CAMPAIGN COMPLIANCE SOLUTIONS	2015-08-03		500 COMPLIANCE CONSULTING
CAMPAIGN COMPLIANCE SOLUTIONS	2015-07-03		500 COMPLIANCE CONSULTING
CAMPAIGN COMPLIANCE SOLUTIONS	2015-11-02		500 COMPLIANCE CONSULTING
CAMPAIGN COMPLIANCE SOLUTIONS	2015-12-02		500 COMPLIANCE CONSULTING
CAMPAIGN COMPLIANCE SOLUTIONS	2015-06-04		500 COMPLIANCE CONSULTING
CAMPAIGN COMPLIANCE SOLUTIONS	2015-05-05		500 COMPLIANCE CONSULTING

CAMPAIGN COMPLIANCE SOLUTIONS 2015-04-12

500 COMPLIANCE CONSULTING

CAMPAIGN COMPLIANCE SOLUTIONS 2015-03-04

500 COMPLIANCE CONSULTING

MCKENNA HARTMAN CONSULTING
LLC 2015-07-13

2500 MCKENNA HARTMAN CONSUL

MCKENNA HARTMAN CONSULTING
LLC 2015-05-05

2500 FUNDRAISING CONSULTING

MCKENNA HARTMAN CONSULTING
LLC 2015-06-04

2500 FUNDRAISING CONSULTING

MCKENNA HARTMAN CONSULTING LLC	2015-04-04	2000 FUNDRAISING CONSULTING
MCKENNA HARTMAN CONSULTING LLC	2015-03-10	2000 FUNDRAISING CONSULTING
NWP CONSULTING	2015-04-12	1500 WEBSITE DESIGN & DEVELOPMENT
NWP CONSULTING	2015-04-12	1098 OVERNIGHT PRINTING: LETTER ENVELOPES
NWP CONSULTING	2015-04-12	350 LETTERHEAD DESIGN
OVERNIGHT PRINTING & GRAPHICS	2015-09-30	796.65 HANDOUT CARDS
OVERNIGHT PRINTING & GRAPHICS	2015-12-16	497.51 POSTCARD PRINTING & MAILING
OVERNIGHT PRINTING & GRAPHICS	2015-11-18	435.89 ENVELOPES

PREMIERE POLITICAL	2015-11-02	2311.02 ROBO CALLS
SERMO DIGITAL LLC	2015-10-23	5000 SERMO DIGITAL LLC
SERMO DIGITAL LLC	2015-10-30	3000 ONLINE ADVERTISING
STOBER BAILEY	2015-04-04	750 POLITICAL DIRECTOR
STOBER BAILEY	2015-04-20	750 POLITICAL DIRECTOR
STOBER BAILEY	2015-03-04	750 POLITICAL DIRECTOR
STOBER BAILEY	2015-03-21	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-12-28	1500 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-12-16	1250 WIN BONUS PAYMENT
STOBER SOLUTIONS	2015-12-03	1000 WIN BONUS PAYMENT
STOBER SOLUTIONS	2015-05-05	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-05-26	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-06-04	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-06-23	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-09-03	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-09-21	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-10-05	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-07-08	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-07-22	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-08-06	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-08-20	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-12-03	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-11-06	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-11-24	750 POLITICAL DIRECTOR
STOBER SOLUTIONS	2015-11-24	750 WIN BONUS PAYMENT

STOBER SOLUTIONS

2015-10-20

750 POLITICAL DIRECTOR

UPWARDS TECHNOLOGIES

2015-11-02

249.85 WEBSITE DEVELOPMENT

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

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 or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with **WAC 390-16-037**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

It also requires campaigns to describe expenses adequately.

The Wilson committee illegally failed to describe/ break down the following 22 expenses:

Vendor	Date	Amount
WALKER EDWARD	2015-03-27	
TECHNOLOGY ALLIANCE	2015-06-05	
STOBER SOLUTIONS	2015-12-16	
STOBER SOLUTIONS	2015-05-05	
STOBER SOLUTIONS	2015-11-06	
SERMO DIGITAL LLC	2015-10-23	
SERMO DIGITAL LLC	2015-10-30	
PREMIERE POLITICAL	2015-11-02	
OVERNIGHT PRINTING & GRAPHICS	2015-05-11	
OVERNIGHT PRINTING & GRAPHICS	2015-04-10	
OVERNIGHT PRINTING & GRAPHICS	2015-08-26	
NORTHWEST PROGRESSIVE INSTITUTE	2015-04-10	
FEDEX OFFICE	2015-03-18	
FEDEX OFFICE	2015-03-12	
FACEBOOK	2015-09-28	
FACEBOOK	2015-08-23	
FACEBOOK	2015-06-30	
FACEBOOK	2015-11-02	
FACEBOOK	2015-05-31	
AUDIOBLOCKS	2015-06-27	
APPLE STORE	2015-07-01	

7) Illegal donation of campaign funds to other political committees. (Violation of RCW 42.17A.430 (8))

Wilson made the following 3 illegal donations to other political committees:

SOUTH KING COUNTY DEMOCRATS	2015-05-16
47TH DISTRICT REPUBLICANS	2015-03-26
43RD DISTRICT DEMOCRATS	2015-12-09

While candidates are allowed to pay market value for objects of real value (like newsletter advertising space, or a booth, etc.) to other candidate/political committees, they are prohibited from transferring funds to them in excess of that amount. Unfortunately, this is what occurred in these instances.

8) Failure to list Bailey Stober and Tom Perry as committee officers. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245)

Wilson's committee failed to list Bailey Stober and Tom Perry as officers on their C1 form, which is required by **RCW 42.17A.205(2)(c)**. Stober made strategic campaign decisions (and did consulting) for the campaign and Tom Perry was the CFO/Treasurer.

Bailey Stober and Tom Perry should have been listed as committee officers, because they, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

WAC 390-05-245 defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and 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."

9) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C1 form. (Violation of RCW 42.17A.425)

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."

Because Bailey Stober and Tom Perry are officers for the committee – despite not being listed on the form – this is a violation. In their roles as strategic consultant and campaign treasurer/CFO respectively, these two individuals doubtlessly made illegal expenditures for the Committee.

10) Failure to report in-kind contribution of mailing list and professional photography (Violation of RCW 42.17A.235)

a) Wilson sent out multiple mailers to registered voters, as well as fundraising letters.

Because Wilson failed to report the in-kind contribution of mailing lists from some outside entity, he is in violation of **RCW 42.17A.235**. He should amend his reports to include the source of his mailing lists for both fundraising and voter contact purposes as an in-kind contribution.

b) In his campaign, Wilson used professional photography in numerous instances.

Unfortunately, Wilson failed to report the in-kind contribution for professional photography. You can find examples of this professional photography on his website (attached).

Wilson must update his reports to include the source of this in-kind contribution.

I urge the PDC to investigate these allegations immediately.

Best Regards,

Glen Morgan

5 Attachments

- pdf
[StoberPenalt...](#)
(223 KB)
- pdf
[BaileyStober...](#)
(845 KB)
- pdf
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(365 KB)
- pdf
[Whois wilson...](#)
(316 KB)
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[About John _...](#)
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 WHOIS

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0

wilson4assessor.com

Updated 1 second ago

DOMAIN INFORMATION

Domain: wilson4assessor.com
 Registrar: GODADDY.COM, LLC
 Registration Date: 2014-10-04
 Expiration Date: 2018-10-04
 Updated Date: 2016-10-10
 Status: clientDeleteProhibited
 clientRenewProhibited
 clientTransferProhibited
 clientUpdateProhibited
 Name Servers: ns1.upwardstech.com
 ns2.upwardstech.com
 ns3.upwardstech.com
 ns4.upwardstech.com

REGISTRANT CONTACT

Name: John Arthur Wilson
 Street: 6717 12th Avenue NE
 City: Seattle
 State: Washington
 Postal Code: 98115
 Country: US
 Phone: +1.2063697677
 Email: jawilson112153@icloud.com

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ADMINISTRATIVE CONTACT

Name: John Arthur Wilson
Street: 6717 12th Avenue NE
City: Seattle
State: Washington
Postal Code: 98115
Country: US
Phone: +1.2063697677
Email: jawilson112153@icloud.com

TECHNICAL CONTACT

Name: John Arthur Wilson
Street: 6717 12th Avenue NE
City: Seattle
State: Washington
Postal Code: 98115
Country: US
Phone: +1.2063697677
Email: jawilson112153@icloud.com

RAW WHOIS DATA

Domain Name: WILSON4ASSESSOR.COM
Registry Domain ID: 1878933054_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: <http://www.godaddy.com>
Update Date: 2016-10-10T22:37:21Z
Creation Date: 2014-10-04T20:05:25Z
Registrar Registration Expiration Date: 2018-10-04T20:05:25Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <http://www.icann.org/epp#clientUpdateProhibited>
Domain Status: clientRenewProhibited <http://www.icann.org/epp#clientRenewProhibited>
Domain Status: clientDeleteProhibited <http://www.icann.org/epp#clientDeleteProhibited>
Registry Registrant ID: Not Available From Registry

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Registrant Name: John Arthur Wilson
Registrant Organization:
Registrant Street: 6717 12th Avenue NE
Registrant City: Seattle
Registrant State/Province: Washington
Registrant Postal Code: 98115
Registrant Country: US
Registrant Phone: +1.2063697677
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: **jawilson112153**@icloud.com
Registry Admin ID: Not Available From Registry
Admin Name: John Arthur Wilson
Admin Organization:
Admin Street: 6717 12th Avenue NE
Admin City: Seattle
Admin State/Province: Washington
Admin Postal Code: 98115
Admin Country: US
Admin Phone: +1.2063697677
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: **jawilson112153**@icloud.com
Registry Tech ID: Not Available From Registry
Tech Name: John Arthur Wilson
Tech Organization:
Tech Street: 6717 12th Avenue NE
Tech City: Seattle
Tech State/Province: Washington
Tech Postal Code: 98115
Tech Country: US
Tech Phone: +1.2063697677
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: **jawilson112153**@icloud.com
Name Server: NS1.UPWARDSTECH.COM
Name Server: NS2.UPWARDSTECH.COM
Name Server: NS3.UPWARDSTECH.COM
Name Server: NS4.UPWARDSTECH.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
>>> Last update of WHOIS database: 2017-03-06T02:00:00Z <<<

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

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