

## Complaint Description

[Glen Morgan](#) (Wed, 23 Oct 2019 at 10:43 PM)

To whom it may concern,

It has come to my attention that widespread, egregious violations of Washington State's campaign finance laws (**RCW 42.17A**) are being committed by Keep Washington Rolling PAC right now during this 2019 political campaign season in their multi-million campaign to oppose Initiative 976.

### **1) Failure to identify top 5 donors (or any donors) on massive campaign mailers (Violation of RCW 42.17A.320)**

It is unclear from the lack of detail provided by this secretive, well-funded corporate PAC how many mailers have been distributed to voters across Washington State in an effort to influence the outcome of this election (see next allegation below). However, as the attached mailer displays, this PAC made zero effort to comply with this transparency requirement. No attempt at all. No top 5 donors were identified. I have attached a photo of at least one of these dark money flyers with photos of the front and back as well as a close up of the lack of donor detail provided.

There is no excuse for this type of flagrant and willful violation of the state's campaign finance laws. Clearly, they didn't want the public to know that Microsoft, Amazon, Vulcan, ACEC Washington, and Expedia were the top 5 donors to this campaign. **This campaign has some of the most experienced treasurers and consultants in the state of Washington getting paid big bucks to spend this corporate money influencing the voters. They know full well the state's requirements, and they have made a willful corporate business decision to violate the law** and take the minor wrist slap fine which might be imposed on them for breaking the law. Just a minor cost of business in today's campaign finance world where the wealthy and politically connected don't have to follow the law. **It also doesn't hurt that most of these donors have also contributed to the Washington State Attorney General's election campaign in the past and plan to do so in the future. This was also good insurance to make sure Washington State's AG Bob Ferguson won't throw the book at them. A wrist slap fine and some legal pat-a-cake is okay, but nothing serious.**

The only way to verify exactly how many millions of mailers this PAC distributed without this basic disclosure statement would be to completely audit the mail houses and media companies hired by this PAC.

### **2) Failure to accurately describe millions of dollars in advertising expenses. (Violation of RCW 42.17A.240(6) & WAC 39016037, RCW 42.17A.235)**

Keep Washington Rolling PAC's campaign has regularly failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures. Most C4s this campaign has filed contain violations of the statute and the rules written by the Public Disclosure Commission which support this statute.

Here are some examples that need to be corrected by this major corporate PAC's multi-million dollar campaign to at least go through the motions and pretend they are complying with the statute: Examples of a failure to provide sufficient detail of expenditures (unambiguous violations of **RCW 42.17A.240(6)** and **WAC 390-16037** (see example B provided at **WAC 390-16-037(3)**) as follows:

For example, the expenditures reported on **PDC Report #100938018** failed to report how many yard signs were printed and purchased from "Capital City Press" on 9/26/19 for \$9,600. This crew knows they need to provide these details, but they just don't care. On the same report, there is not an adequate amount of information or detail for the "TV advertising" from vendor "Screen Strategies Media" for \$1,086,770 on 9/25/19. On October 3, 2019, on this same report and with the same "Screen Strategies Media" for another \$680,315 still zero details as required by law. Another purchase on October 3, 2019 for "signs" from Capital City Press for a paltry \$5,300 and "literature" for another \$7,000, and another \$83,420 for mail production and postage (this amount was spent twice – once on October 8<sup>th</sup> and once on October 10<sup>th</sup>). No legal details provided. How many pieces? Who knows? This crew knows the law, they just don't care because they know that nobody will hold them accountable. These are clear violations of **WAC 390-16-037(3)**. An additional \$726,000 was spent on "TV Advertising" reported on this same C4 without any details as to where, how many ads, when the ads were run, etc. No details. All of these violations are occurring within a month of the election.

This is a well-funded campaign. They have enough money to spend thousands per month on "compliance" and "legal." I know some of these vendors, the treasurer, and many of the consultants involved in this PAC. They know the law. I've filed complaints on many of them before. They know the rules. They just don't care. Maybe it is just a business decision – the micro fines and wrist slaps from the PDC is just a cost of doing business. Maybe they believe nothing will happen at all, so why bother trying to comply. Just sorta file the paperwork and call it close enough.

There is no excuse for a failure to be fully transparent or compliant with the statute. Far smaller and less experienced PACs run by volunteers are able to be more compliant.

Hopefully the PDC will take the law seriously for multi-million dollar corporate PACs like this just as much as the law is enforced on others.

Let me know if you need additional information.

Best Regards,

Glen Morgan

**What impact does the alleged violation(s) have on the public?**

Even Multi-million dollar mega corporate PACs like this one must be expected to follow the same laws imposed on the rest of the little people who dare to participate in the political process. This crew has some of the highest paid, experienced consultants and officers in the state, and their willful disregard for the law just because they have mega cash from the biggest corporations in the world, doesn't mean they are above the law.

**List of attached evidence or contact information where evidence may be found.**

see attached

**List of potential witnesses with contact information to reach them.**

Every officer, consultant, and probably the media companies involved in this mega PAC should be interviewed.

**Complaint Certification:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.