

Complaint Description

File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Thu, 21 Jun at 12:52 PM) via Portal [Meta](#)

To Whom it May Concern –

It has come to my attention that the \$15 Now Tacoma Political Action Committee (PAC) committed multiple violations of **RCW 42.17A** during their 2015 political campaign.

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 \$15 NOW PAC failed on numerous occasions to do this. (See **Exhibits A - "Illegally late deposits and contributions"**).

Please note that these reports were reported over **399 cumulative days late**. These are not just technical mistakes or error, and several of these reports were due during the critical 30day window before the election. Please note, many of these are first time reports, and not just technical corrections or minor adjustments.

Because many of these late reports occurred during the critical 30day window of the 2015 general campaign elections, their failure to provide accurate and complete information about both the PAC funding sources and how they spent their funds, they have denied the public the right to know the truth about their political activities. Please note that the PAC officers and their treasurer are seasoned and experienced in the political process and are well aware of the significance of their repetitive violations of state law. Of even greater concern is how many additional violations have been committed by this PAC and have yet to be revealed to the public.

The PDC should investigate the possibility that this PAC committed the above violations willfully and 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 note that I have provided the attached spreadsheet in two different file formats for staff convenience.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

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

The public (and the media - who often report the facts to the public) has been repeatedly and systematically denied accurate, correct, and timely information about who is funding this large and well-funded political campaign (dark money concerns) , how they are spending their political campaign money and by doing so, they are disguising and obscuring the source of funding for this PAC and how their organization is spending that same money. This is far more than just a technical mistake. Many of these reports are submitted months late, and several covered the critical campaign period of 30days before the election in 2015.

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

A list has been provided in both Excel and PDF file formats for staff convenience which details each late C3 and C4 report, including PDC tracking #s for each report, date they were due, date they were filed and the days late for each. Additionally, for staff convenience the total days late for these reports has been included in these reports and referenced in the original complaint.

List of potential witnesses with contact information to reach them.

All information provided and referenced can be verified using publicly available C3 and C4 reports as referenced in the complaint and backup documents provided. Please note, judging from the extensive, repetitive, and egregious nature of these violations, this investigation may require interviewing both the Treasurer, any other listed officers, and at least a few of the listed donors and recipients of this PAC's funds to see how many additional reports are missing or missing information.