

Complaint Description

[Glen Morgan](#) (Wed, 20 Jun at 10:14 AM)

To Whom it May Concern –

It has come to my attention that **Michael Chapman** (state legislator in the 24th Legislative District) has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. The violations documented here are extensive and egregious. Despite recent investigations into Chapman's history of widespread and repetitive violations of Washington State's campaign finance laws (see **PDC Case #28240**), it appears that Chapman, his treasurer and his campaign are willfully flouting and mocking both the Public Disclosure Commission and our state's campaign finance laws without a care or even attempt to be compliant or follow the law.

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, Michael Chapman has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late deposits and contributions"**).

Please note that these reports were reported over **18,542 cumulative days late**. This isn't just a technical mistake or error. Many of these are first time reports, and not just technical corrections. Chapman and his treasurer are seasoned and experienced in the political process and are well aware of the significance of their repetitive violations of state law. This was a systematic attempt to disguise the true source of campaign funding and how the campaign used expenditures until long after the campaign was over. Despite previous complaints filed against Chapman (see **PDC Case #28240**), these violations continue to the current day and no behavioral change has been documented at this point in time. The law is still being treated like an afterthought or maybe a guideline with no consequences attached by Chapman, his treasurer and his campaign.

The PDC should investigate the possibility that Michael Chapman committed the above violations 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 spreadsheets 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 Rep. Chapman's political campaigns, how he is spending his money and by doing so, he is disguising and obscuring the source of funding for his political campaigns and how his campaign is spending that same money. This is far more than just a technical mistake. Many of these reports are submitted months late.

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 report 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 Mr. Chapman and his treasurer to see how many additional reports are missing or missing information.

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.