

Respondent Name

Carrie Hesch

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#) (Mon, 19 Oct 2020 at 11:07 AM)

To whom it may concern,

It has come to my attention that serious violations of Washington State's campaign finance laws (**RCW 42.17A**) have been committed by Carrie Hesch, current candidate for the Washington State Legislature in the 26th Legislative District. The violations are detailed as follows:

1) Failure to report significant expenditures 21 days before an election (Violation of RCW 42.17A.235, .240)

Carrie Hesch is running for office in the 26th Legislative District and is running a well-funded campaign (almost \$300k reported to date, assuming nothing has been concealed from the PDC) with experienced vendors, treasurer, and consultants. Despite this fact, this campaign has only reported \$50,000 of Comcast ad buys through vendor Cerillion N4 Partners out of Seattle (see attached C4 report #101006482). However, this information is incomplete and appears to be **willfully reported incomplete to the PDC to conceal from the public how much money has actually been spent by this campaign on cable television ad buys.**

For example, please see the Comcast ad buy (according to Comcast itself) which is a public record under both state and federal election law. This is a 139 page document detailing the actual ad buy by Cerillion N4 Partners for the Carrie Hesch campaign which explicitly details the \$113,000 of actual expenditures for this ad buy. **The campaign, in this case, has willfully concealed at least \$63,000 of political campaign advertising during the critical 21 days before the election.**

Please note, based on the Comcast information provided, this is an invoice, NOT unreported Debt. However, even if the campaign were to claim it was unreported debt, it should be noted that this campaign did not report it as unreported debt either.

2) Failure to provide adequate or accurate expenditure details on Comcast political advertising (Violation of RCW 42.17A.240(6) & WAC 390-16-037, WAC 390-16-205, RCW 42.17A.235)

The Hesch campaign has obviously failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures. This is a classic example of a failure to provide sufficient detail of expenditures (unambiguous violations of **RCW 42.17A.240(6)** and **WAC 390-16-037** (see example B provided at **WAC 390-16-037(3)**) and also **WAC 390-16-205** for reference.

If the baseline information is false (\$50k reported vs. \$113k actual) then, the details provided in these reports are also false and inaccurate.

3) Willful concealment of expenditures 21 days before an election (See RCW 42.17A.750(2)(c))

This campaign, in collusion with its vendor, Cerillion N4 Partners appears to be willfully concealing massive political advertising expenditures from the public in order to obtain some perceived strategic political campaign advantage from this concealment. Clearly, they are assuming they would not get caught, and if caught that the penalties were so minor and laughable that it is worth the risk. **With the years of experience by all the consultants, treasurer, and vendors involved in this campaign, who certainly know the law, this must be recognized as political activity intended with willful and malicious intent to deceive the public by falsifying documents filed with the PDC.**

Please let me know if you need any further information on this case.

Best Regards,

Glen Morgan

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

The public has a right to know if a candidate for the state legislature is willing to conceal massive political advertising expenses in a willful, careful, and malicious violation of Washington State law in an effort to gain some strategic advantage with the voters in the last 21 days of the election cycle.

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

See fake data provided on attached C4 vs. true billing from Comcast report attached.

List of potential witnesses with contact information to reach them

The vendors (Cerillion N4 Partners), consultants, and the treasurer are clearly working together to deceive the public and willfully and with malice aforethought to violate the law on this one.

Certification (Complainant)

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.