

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Wed, 22 Nov at 11:00 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that the 38th Legislative District Democrats have habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

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, 38th District Democrats has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

2) 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 be reported on form C4. 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.

38th District Democrats illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

3) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)

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's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with **WAC 390-16-037** and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4. 38th District Democrats illegally failed to break down the following expenses.

(See **Exhibit C - "Illegal failure to break down expenditures"**)

4) Failure to disclose earmarked contribution. (Violation of RCW 42.17A.270) (See attachment & PDC Complaint #16901)

"On the PDC website, the Friends of Brian Sullivan for Everett Mayor campaign reports that they received a donation of \$10,000 from the 38th Legislative District Democrats on April 3, 2017. I have reason to believe this is a pass-through donation from the Everett Firefighters Local 46 union, who reportedly made this donation to the 38th LD under the condition that it be passed-through to the Sullivan campaign. The donation from the Firefighters union to the 38th LD, in the amount of \$10,500, was recorded on 3/22/17. It allegedly included the additional \$500 to be retained by the 38th LD."

The PDC should investigate the possibility that 38th District Democrats 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 don't hesitate to contact me if you need any additional information.

Please note, I have provided all three spreadsheet attachments in both Excel and PDF file formats as requested by PDC staff. The fourth attachment is just a PDF file.

Best Regards,

Glen Morgan

File a Formal Complaint - Jackie Pryor

[Jpryor030](#) reported 4 days ago (Fri, 14 Apr at 1:17 PM) via Portal Meta

On the PDC website, the Friends of Brian Sullivan for Everett Mayor campaign reports that they received a donation of \$10,000 from the 38th Legislative District Democrats on April 3, 2017. I have reason to believe this is a pass-through donation from the Everett Firefighters Local 46 union, who reportedly made this donation to the 38th LD under the condition that it be passed-through to the Sullivan campaign. The donation from the Firefighters union to the 38th LD, in the amount of \$10,500, was recorded on 3/22/17. It allegedly included the additional \$500 to be retained by the 38th LD.