

File a Formal Complaint - Glen Morgan

Glen Morgan reported (Thu, 19 Apr at 2:16 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that the Thurston County Democratic Central Committee, its treasurer, its officers, and any parent or subsidiary organization associated with it (hereafter collectively referred to as “respondent”) 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, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (**WAC 390**). Unfortunately, the respondent has failed on numerous occasions to do this, including, but not limited to the late reports detailed in the attached exhibit. Additionally, the respondent has failed to report debts & liabilities (see: attached internal respondent report on liabilities) and properly break down/detail expenditures.

This attached **Exhibit A – “Illegally reported late C3 and C4 reports”** as supporting evidence that the TCDs are still failing to meet filing deadlines. Please note that many of these are new late reports, not just the reports which are being updated on a regular basis in an effort to attain some level of temporary accuracy.

I also believe that the Thurston County Democrats have systematically failed to accurately report expenditures that are in-kind contributions to candidates they support or independent expenditures on their form C4 in violation of **WAC 390-16-037**.

It should be particularly notable that these violations are continuing to occur despite the fact the Washington State Attorney General is in active litigation against the Thurston County Democratic Central Committee for a historic pattern of failure to comply with this statute (See **Thurston County Superior Court #17-2-00972-34**). Please note that this litigation has been amended on multiple occasions to include additional violations discovered and committed by the Thurston County Democrats over the past 15 months (most of which I have provided to the AG’s office during this time).

There appears to be a pattern of treating Washington State’s fair campaign practices act (**RCW 41.17A**) as an afterthought by this organization regardless of the attention, litigation, and potential penalties that may be accruing. At this point, it is demonstrably evident that no member of the public can be confident with any degree of accuracy in either the historic or current reports filed by the respondent with the PDC. This serves neither the objective of the statute or the over-arching goals of transparency in the political process today. It is difficult to imagine any mitigating factors that can continue to explain the repeated serial violations of the statute by this respondent. Conceivably, only serious intervention by both the Public Disclosure Commission and the Washington State’s Attorney General’s office has the potential to rectify this situation.

The PDC should investigate the possibility that the respondent 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 the attached spreadsheet to the PDC in two different file formats for staff convenience. The balance sheet is only in a .PDF file for reference.

Best Regards,

Glen Morgan

3 Attachments