

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Mon, 16 Oct at 9:51 AM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the 29th District Democrats has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**.

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 29th District Democrats has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

It is important to note that the 29th District Democrats have not filed a single report in 2017 to date, despite being obligated to do so after having checked the "full-reporting" option on their latest C1-pc.

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.

The 29th District Democrats illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

The PDC should investigate the possibility that the 29th 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.

Best Regards,

Glen Morgan

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --					As of -- 10/16/2017	
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
			767			
1	FAGAN MICHAEL	10/5/2015	\$ 398.30	REIMBURSEMENT FOR ADVERTISING, BOOTH SPACE, ETC	This should have been reported on the post-primary C4.	767
2	BENN TIM	10/7/2015	\$ 500.00	CAMPAIGN MANAGER	This should have been reported on the post-primary C4.	767
3	SEATTLE MAILING BUREAU	10/8/2015	\$ 1,403.79	PRINTING	This should have been reported on the post-primary C4.	767
		Total	\$ 2,302.09			

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- **1734**

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100738044	C4	Y		5/10/2016	12/12/2016	216
2	100738119	C4	Y		6/10/2016	12/12/2016	185
3	100738047	C4	Y		6/10/2016	12/12/2016	185
4	100738125	C3	N	6/20/2016	6/27/2016	12/12/2016	168
5	100738052	C4	N		7/12/2016	12/12/2016	153
6	100738129	C4	Y		7/12/2016	12/12/2016	153
7	100738053	C4	N		7/26/2016	12/12/2016	139
8	100738133	C4	Y		7/26/2016	12/12/2016	139
9	100738055	C4	N		9/12/2016	12/12/2016	91
10	100738134	C4	N		10/18/2016	12/12/2016	55
11	100703310	C4	N		5/10/2016	6/20/2016	41
12	100738136	C4	N		11/1/2016	12/12/2016	41
13	100703312	C3	N	4/17/2016	5/10/2016	6/20/2016	41
14	100703313	C3	Y	4/12/2016	5/10/2016	6/20/2016	41
15	100703308	C3	Y	4/12/2016	5/10/2016	6/20/2016	41
16	Handfiled	C4	N		2/10/2016	3/11/2016	30
17	100703311	C4	N		6/10/2016	6/20/2016	10
18	100695472	C3	Y	4/12/2016	5/10/2016	5/14/2016	4
19	100690482	C4	N		4/11/2016	4/12/2016	1