

Respondent Name

Lance Gurel

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#)

reported via the portal

7 months ago (Thu, 10 Aug 2023 at 6:34 PM)

To whom it may concern,

It has recently come to my attention that Lance Gurel, during his failed 2020 campaign for the Washington State Legislature (4th LD) violated Washington State's campaign finance laws (**RCW 42.17A**). The details are as follows:

1) Failure to identify, or willfully conceal the true source of campaign contributions (Violation of RCW 42.17A.240, .235, possibly Violation of RCW 42.17A.220 as well)

Washington State law clearly requires a political candidate to properly identify the true source of a contribution to their campaign (See **RCW 42.17A.240(2)**). This failed politician, however, on at least six occasions has attempted to conceal the true source of their contributions by attributing the source of funds to a payment aggregator (which is a corporate entity that aggregates payments to the final recipient of those funds). The specific violations are as follows:

- On October 14, 2020 - **\$200 contribution attributed falsely** to "Act Blue" (See **PDC Report #101007575, attached for Staff reference**)
- On September 30, 2020 - **\$31.52 contribution falsely attributed** to "Act Blue" (See **PDC Report #101002532, attached for Staff reference**)
- On September 23, 2020 - **\$28.57 contribution falsely attributed to "Act Blue"** (See **PDC Report #101000937, attached for Staff reference**)
- On October 7, 2020 - **\$5.00 contribution falsely attributed to "Act Blue"** (See **PDC Report #101004121, attached for Staff reference**)
- On September 29, 2020 - **\$5.00 contribution falsely attributed to "Act Blue"** (See **PDC Report #101002224, attached for Staff reference**)
- On September 25, 2020 - **\$3.00 contribution falsely attributed to "Act Blue"** (See **PDC Report #101001143, attached for Staff reference**)

Between the six of these contributions, falsely reported, it appears that at least \$297.99 of the contributions to this politician in 2020 were falsely reported to the public. In fact, this politician, it appears has concealed the true source of these funds for almost 4 years now. It seems appropriate that the veil of secrecy be lifted and the public be made aware the true source of these campaign contributions now – finally. Three years is more than enough time for the public to wait, and I'm fairly sure nobody can hold their breath any longer.

This politician must correct this illegal action. The treasurer must go back and properly identify and account for the true source of each contribution concealed by these aggregated false report. This would require refilling proper C3 reports reflecting the true source of the cash received. These steps should be taken immediately so that the public can know the truth about where this large volume of campaign cash truly came from.

By the way, when I reviewed every candidate who has used Act Blue in Washington State in the last 5 years as a payment aggregator, it appears that this candidate is the only one who attempted to conceal the true source of his campaign funds behind the façade of this payment aggregator (there was another candidate back in 2016, but that exceeds the statute of limitations for a complaint of this nature).

2) Total concealment of some expenditure information from the public (Violation of RCW 42.17A.240, 42.17A.235)

Among other possible and likely violations and concealments, it appears this failed candidate clearly failed to report the filing fee for this office – which should be significant. There is no good reason to conceal this information from the public. Yet, this was concealed from the public regardless. For clarification of the need to report this expenditure, I've attached the relevant AGO (**AGO 1974:16 attached**) which clearly spells this requirement to report this expenditure as it applies in this case for even this failed politician.

3) Failure to accurately describe expense, and the illegal concealment of required information from the public. (Violation of RCW 42.17A.240, RCW 42.17A.235 & WAC 390-16-037)

Once I realized this politician would break the law with such carelessness and disregard for the truth, I realized it was far more likely that lawbreaking was a habit. So I started to look closer at this campaign. It turns out this campaign has failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures frequently. Here **are just five specific examples of failing to detail how many campaign signs or mailers were purchased – A clear and explicit violation of WAC 390-16-037, Example B:**

- On **March 6, 2020** – This candidate claims to have used vendor "Preferred Labor Signs" and reportedly **spent \$2,175.50 – on "Signs"** but no amount given as clearly legally required and specified in **WAC 390-16-037, example B (See PDC Report #100967537, attached for Staff Reference).**
- On **September 16, 2020** – This candidate claims to have used vendor "Preferred Labor Signs" and reportedly **spent \$1,115.10 – on "Campaign Yard Signs"** but no amount

given as clearly legally required and specified in **WAC 390-16-037, example B (See PDC Report #101002848, attached for Staff Reference)**.

- On **April 14, 2020** – This candidate claims to have used vendor “Preferred Labor Signs” and reportedly **spent \$992.50 – on “Yard Signs”** but, again, no amount or number of signs provided despite being clearly legally required and specified in **WAC 390-16-037, example B (See PDC Report #100967538, attached for Staff Reference)**.
- On **October 1, 2020** – This candidate claims to have used vendor “Preferred Labor Signs” and reportedly **spent \$822.45 – on “Rack Cards”** but, once again, no amount given despite being so clearly legally required and specified in **WAC 390-16-037, example B (See PDC Report #101006070, attached for Staff Reference)**.
- On **June 19, 2020** – This candidate claims to have used vendor “Preferred Labor Signs” and reportedly **spent \$103.34 – on “Postcards”** but no amount given, despite how clearly this was legally required and specified in **WAC 390-16-037, example B (See PDC Report #100985629, attached for Staff Reference)**.
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- To be fair to this campaign, the solution to this violation is at a minimum (in addition to whatever sanctions the PDC chooses to impose, this campaign must go back and correct all these legally deficient C3 reports. It may be three years late, but at least the truth can finally be known to the public. Truth denied or concealed for so long is bad enough, but at least it can finally be corrected by this lawbreaking crew.

4) Failure to list the vendor and the address of the vendor for in-kind contributions, therefore concealing from the public the true source of these contributions (Violation of RCW 42.17A.240, RCW 42.17A.235)

When an individual or entity makes a donation of goods or services to a political committee so that the committee may attempt to sell these goods or services to others in exchange for money, this is an in-kind contribution.

I want to draw attention to the PDC’s own website recommendations for how PACs and campaigns need to report this information.

See original link here:

<https://www.pdc.wa.gov/registration-reporting/candidates-committees/contributions/kind-contributions>

Specifically, I want to draw attention to the PDC’s specific requirements of reporting:

*“In-kind donations that are not incidental **must** be fully reported in Part 1 of Schedule B to the C-4 **with the following details:** the date the contribution was received; the name and full address of the contributor; **if the in-kind contribution is a good or service purchased from a vendor, include the name and address of the vendor;** a brief description of the contribution; its fair market value; the cumulative total this contributor has given for the primary or general election, whichever applies; a designation whether this contribution is for the primary or general election; and if the contributor is an individual who has cumulatively given more than \$250 to the campaign,*

including both primary and general contributions, identify the individual's employer (by name, city and state) and occupation."

This committee has failed to do this on numerous occasions over the past few years.

For both staff and the lawbreaker's reference, **I will detail a handful of the deficient examples**, so that the obvious lawbreaking can be hopefully corrected in the future to prevent the need to file additional maintenance and compliance complaints like this one:

- **Violation Example #1** - \$28.52 on 8/29/2020 (**PDC C4 Report #100985629**) for "campaign office supplies" donated by Lance Gurel. As the PDC rules so clearly state above, it is a legal requirement for this politician to report where the office supplies were purchased and the address of the original supplier of these office supplies. The public has a right to know, and this politician has a duty to report it, per PDC explicit rules quoted above.
- **Violation Example #2** – On the same C4 as above - \$36.15 on 7/13/2020, for "Tools and Items for Campaign Signs" donated by Lance Gurel. Again, as the PDC rules so clearly state above, it is a legal requirement for this politician to report where these tools and items for campaign signs were purchased and the address of the original supplier of these tools and items. The public has a right to know, and this politician has a duty to report it, per PDC explicit rules quoted above.
- **Violation Example #3** – \$437.50 on 5/02/2020 (**PDC C4 Report #100974906**) for "Purple Horizons Consulting" donated by Lance Gurel. Again, as the PDC rules so clearly state above, it is a legal requirement for this politician to report at least the address of this vendor and what type of consulting he thought he was buying.
- **Violation Example #4 & #5** – on the same C4 as above (**PDC C4 Report #100974906**) this politician didn't report the true source, vendor and address for fence posts, or "3inch buttons." Again, just failing to follow the law with nearly every in-kind report

I didn't attach a complete spreadsheet for these violations in this failed politician's campaign because while they are common, there do not appear to be more than 20, but, just like all the violations defined above, it appears necessary for this politician to go back and correct the record, get transparent, and get right with the public and report the truth to the PDC. It may have been three years since this campaign blew up and failed, but that doesn't mean they can't find the truth and finally report it for both the public and posterity to better understand what happened here.

Lance Gurel – A sad history of lawbreaking

I will note for the record, this politician does have a history of lawbreaking as evidenced in my last complaint filed against this politician in 2019, during his failed campaign for the Spokane Valley Council at the time (See **PDC Enforcement Case #57244, see Attached PDC Warning Letter**

and the Original Complaint I filed in that case for Staff Reference). While this politician got off easy with a weak “naughty, naughty” letter, he obviously decided to ignore the PDC’s very generous attempt to give him a break, and he promptly broke the law less than a year after receiving that letter from the PDC. **His past behavior and willingness to break the exact same laws less than a year later clearly indicates a lack of respect for the law and no concern about consequences if he continues to break it in the future.**

Also, if politicians like this, as sloppy as they might have been in this case, are allowed to flagrantly disregard the law, then it will only encourage more lawbreaking in the future. Best to correct those who have broken the law right now in the hope (as vain as it might appear) that future politicians can learn from these lawbreaker’s penalties and experiences.

Let me know if you need anything else on this one.

Best Regards,

Glen Morgan

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

The public has a right to know the truth about how politicians spend their campaign cash, where it comes from, and they expect transparency of some minimal level from these politicians. Even politicians who laugh at the law and believe they are untouchable like this one.

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

All referenced by tracking number within the body of the complaint, and if indicated attached as exhibits

List of potential witnesses with contact information to reach them

Everyone associated with this guy - this is the second time he has earned a complaint of this type in the last few years.

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.