

## File a Formal Complaint - Glen Morgan

**Glenmorgan89** reported 9 hours ago (Thu, 26 Jan at 12:51 AM) via Portal Meta

To Whom it May Concern (and it should concern anyone who cares about campaign finance law)--

It has come to my attention that Rep. Jeff Morris has committed numerous violations of RCW 42.17A in his recent 2016 campaign for State Representative in the 40th Legislative District.

### 1) Failure to include sponsor ID on website. (Violation of RCW 42.17A.320)

As you can clearly see on his website "[www.MorrisCampaign.com](http://www.MorrisCampaign.com)" (also attached), Morris failed to include sponsor ID: namely, a "paid for by" statement.

### 2) Failure to report in-kind contribution/expenditure for renewal of website domain. (Violation of RCW 42.17A.235, .240)

On May 23, 2016, the Morris campaign (or a volunteer running the website) renewed the website domain. (See attachment of domain information)

Unfortunately, this was illegally not reported as an in-kind contribution or an expenditure.

### 3) Failure to timely file C1. (Violation of RCW 42.17A.205 (1))

State law requires that candidates file their C1 within two weeks of receiving contributions or making expenditures, whichever is earliest.

Morris made a campaign expenditure on 1/6/2015 to "Complete Campaigns", however he failed to file his C1 until 1/24/15, making him late on filing this important paperwork. Unfortunately, this appears to be a pattern.

### 4) Failure to report expenditure/in-kind contribution for professional photography. (Violation of RCW 42.17A.235)

Morris failed to report expenditures/in-kind contribution for professional photography. You can see his professional photography on the attached PDF of his website. These must be reported.

### 5) Failure to list Argo Strategies and Rita Sullivan as committee officers. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245)

Morris' campaign failed to list Argo Strategies and Rita Sullivan as officers, which is required by **RCW 42.17A.205(2)(c)**. Argo Strategies was the consultant for the campaign and Rita Sullivan was the campaign manager.

I believe that Argo Strategies and Rita Sullivan should have been listed as committee officers, because they, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

**WAC 390-05-245** defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee."

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

### 6) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C1 form. (Violation of RCW 42.17A.425)

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."

Despite doing consulting for the Morris campaign, Argo Strategies did not appear as an officer on Morris' C1 form. In her role as campaign manager, Rita Sullivan doubtlessly also made illegal expenditures for the Morris campaign.

Unfortunately, Argo Strategies and Rita Sullivan both illegally made expenditures for the Morris campaign, in violation of state law.

**7) 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. 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 Morris campaign illegally failed to report the following 49 debts on preceding C4s:

Vendor	Date	Amount	City	State	Description
ARGO STRATEGIES	2016-08-07	2805.49	SEATTLE	WA	JUNE TREASURY
ARGO STRATEGIES	2016-10-01	750	SEATTLE	WA	SEPT TREASURY
ARGO STRATEGIES	2016-10-01	750	SEATTLE	WA	JULY TREASURY
ARGO STRATEGIES	2016-10-01	750	SEATTLE	WA	AUGUST TREASURY FEE
ARGO STRATEGIES	2016-11-08	750	SEATTLE	WA	OCT TREASURY
ARGO STRATEGIES	2015-02-18	750	SEATTLE	WA	NOV TREASURY
ARGO STRATEGIES	2015-02-18	500	SEATTLE	WA	DEC TREASURY
ARGO STRATEGIES	2016-04-14	450	SEATTLE	WA	MARCH TREASURY + IRS/1
ARGO STRATEGIES	2016-05-30	400	SEATTLE	WA	APRIL TREASURY
ARGO STRATEGIES	2016-06-12	400	SEATTLE	WA	MAY TREASURY
ARGO STRATEGIES	2016-03-12	350	SEATTLE	WA	AD (SKAGIT PUBLISHING)
ARGO STRATEGIES	2015-10-29	275	SEATTLE	WA	OCT TREASURY

ARGO STRATEGIES	2015-10-20	275	SEATTLE	WA	SEPT TREASURY
ARGO STRATEGIES	2015-12-25	275	SEATTLE	WA	NOV TREASURY
ARGO STRATEGIES	2016-02-08	275	SEATTLE	WA	JANUARY TREASURY
ARGO STRATEGIES	2015-06-05	275	SEATTLE	WA	APRIL FEE
ARGO STRATEGIES	2015-06-05	275	SEATTLE	WA	MAY FEE
ARGO STRATEGIES	2015-07-23	275	SEATTLE	WA	JUNE TREASURY FEE
ARGO STRATEGIES	2015-08-13	275	SEATTLE	WA	JULY TREASURY
ARGO STRATEGIES	2015-09-14	275	SEATTLE	WA	AUGUST TREASURY
ARGO STRATEGIES	2015-02-18	225	SEATTLE	WA	JAN TREASURY
ARGO STRATEGIES	2015-04-14	225	SEATTLE	WA	MARCH FEE
ARGO STRATEGIES	2016-02-08	225	SEATTLE	WA	JANUARY TREASURY
ARGO STRATEGIES	2016-03-12	150	SEATTLE	WA	FEB TREASURY FEE
ARGO STRATEGIES	2015-04-14	150	SEATTLE	WA	FEB FEE
COLLEGE WAY SELF STORAGE	2015-06-15	664	MOUNT VERNON	WA	CAMPAIGN STORAGE LOC
COMPLETE CAMPAIGNS	2015-06-03	75	SAN DIEGO	CA	MONTHLY DATABASE FEE
COMPLETE CAMPAIGNS	2015-09-04	75	SAN DIEGO	CA	DATABASE FEE

COMPLETE CAMPAIGNS	2015-07-09	75	SAN DIEGO	CA	DATABASE FEE
COMPLETE CAMPAIGNS	2015-08-05	75	SAN DIEGO	CA	DATABASE FE
COMPLETE CAMPAIGNS	2015-04-07	75	SAN DIEGO	CA	MONTHLY DATABASE FEE
COMPLETE CAMPAIGNS	2015-03-04	75	SAN DIEGO	CA	DATABASE FEE
COMPLETE CAMPAIGNS	2015-05-08	75	SAN DIEGO	CA	MONTHLY DATABASE FEE
COMPLETE CAMPAIGNS	2015-01-06	75	SAN DIEGO	CA	DATABASE FEE
COMPLETE CAMPAIGNS	2015-02-05	75	SAN DIEGO	CA	MONTHLY DATABASE FEE
COMPLETE CAMPAIGNS	2016-01-31	75	SAN DIEGO	CA	DATABASE FEE
COMPLETE CAMPAIGNS	2015-10-09	75	SAN DIEGO	CA	DATABASE FEE
COMPLETE CAMPAIGNS	2015-12-08	75	SAN DIEGO	CA	DATABASE FEE
COMPLETE CAMPAIGNS	2015-11-05	75	SAN DIEGO	CA	DATABASE FEE
COMPLETE CAMPAIGNS	2016-02-08	37.5	SAN DIEGO	CA	PARTIAL DATABASE FEE
IS POLITICAL INC	2016-03-03	250	SAN DIEGO	CA	DATABASE FEE - TWO MON
IS POLITICAL INC	2016-05-04	189.66	SAN DIEGO	CA	DATABASE FEE + PRORATI
IS POLITICAL INC	2016-08-02	125	SAN DIEGO	CA	DATABASE FEE
IS POLITICAL INC	2016-06-02	125	SAN DIEGO	CA	DATABASE FEE

IS POLITICAL INC	2016-07-05	125	SAN DIEGO	CA	MONTHLY DATABASE FEE
IS POLITICAL INC	2016-11-02	125	SAN DIEGO	CA	MONTHLY DATABASE FEE
IS POLITICAL INC	2016-10-03	125	SAN DIEGO	CA	MONTHLY DATABASE FEE
IS POLITICAL INC	2016-09-02	125	SAN DIEGO	CA	DATABASE FEE
IS POLITICAL INC	2016-12-02	125	SAN DIEGO	CA	MONTHLY DATABASE FEE

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

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**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

The Morris campaign illegally failed to break down the following expense:

Vendor	Date	Amount	City	State	Description
MORRIS JEFF	2016-05-23	1204.24	ANACORTES	WA	FILER FEI

This expense must be broken down to show the exact amount of money paid to each entity.

#### 9) Illegal personal use of campaign funds for undocumented mileage expenses (Violation of RCW 42.17A.445)

On 5/27/2015, Morris used his campaign funds to pay himself a \$200 "stipend" for "travel".

Morris failed to take meticulous notes in a travel log: accurately detail the miles traveled on each trip and describe how the trips related to the campaign. The claimed legal reimbursement amount of \$200 is entirely fictitious.

Morris must be forced to reimburse his campaign this amount.

#### 10) Failure to accurately file contribution report (C3) by deadline. (Violation of RCW 42.17A.235)

According to the PDC, the accurate report of contributions (C3) for the month of 8/1/16 to 8/7/16 was due on 8/8/16.

Unfortunately, Morris' campaign failed to file an accurate report containing all contributions before the deadline. Namely, Morris' original C3 for this period (Ref. #100714692 -- filed late on the 8/9/2016) failed to report the following contributions:

- Broadband Communication Association of Washington -- \$2000
- Tesoro Petroleum Company -- \$250
- Cascade Natural Gas -- \$250
- Tulalip Tribes of Washington -- \$1000
- WA Federation of State Employees -- \$500
- Expedia, Inc. -- \$500
- WA Forest Protection Association -- \$500
- Rebecca Bogard -- \$250

Morris' campaign failed to file an accurate report until 8/22/2016, when they submitted an amended C3 that included these. This was is well past the statutory deadline.

#### 11) Illegal acceptance of overlimit contribution, failure to file accurate C4s (Violation of RCW 42.17A.405 & .235)

The Morris campaign illegally accepted an overlimit contribution from the Lummi Indian Business Council.

While this over limit contribution was later "refunded", they should not have been deposited in the first place, as they were in excess of statutory limits.

Moreover, the Morris campaign also failed to follow the appropriate PDC instructions for fixing this issue: "Do not use the corrections or adjustment feature. The contribution must be "deleted" and an amended C3 and C4 filed for the adjustment to be reflected in the PDC database. The contribution must be 'undeposited', deleted and the C3 amended and any affected C4's amended." Instead, the Morris campaign illegally reported the refund as an expenditure on his C4s.

The erroneous and illegal C4 must be amended.

#### 12) Illegal donation to House Democratic Campaign Committee and Skagit County Democrats (Violation of RCW 42.17A.430 (8))

Morris made the following illegal donations to political committees:

HOUSE DEMOCRATIC CAMPAIGN COMMITTEE	8/4/2016	\$35,000.00	SEATTLE WA	98134	SURPLUS DONATION
SKAGIT COUNT DEMOCRATIC PARTY	9/11/2016	\$1,000.00	MOUNT VERNON WA	98273	RENT

Per state law, these donations *may only come from candidate surplus fund accounts, and not directly from the candidate committee.* (see: [https://www.pdc.wa.gov/sites/default/files/campaign-contribution-limits/LimitsChart\\_0.pdf](https://www.pdc.wa.gov/sites/default/files/campaign-contribution-limits/LimitsChart_0.pdf))

The expenditure to the Skagit County Democratic Party may have been a legitimate expense, however, it appears almost certain that the Morris campaign paid over market value for the office space and therefore illegally contributed to the Skagit County Democrats with candidate committee funds.

#### 13) Illegal use of Surplus Funds (Violation of RCW 42.17A.430 (7))

Morris illegally used his surplus funds account for the following expenditure:

MORRIS JEFF 1/30/2015 \$659.58 CELL REIMBURSEMENT (VERIZON)

Because this phone number is not used exclusively for nonreimbursed public office-related expenses or campaign purposes, it is an illegal expenditure of surplus funds.

#### 14) Failure to report last minute contributions. (Violation of RCW 42.17A.265)

The committee failed to report last minute contributions (@ aggregate of \$1000 or higher) from the following groups within the 48 hour time limit on an LMC or C3 form, as required by law:

a) General Election (21 Days -- 10/18/2016 to 11/8/2016)

PACIFIC NW REGIONAL COUNCIL OF CARPENTERS	11/2/2016	\$400.00 (aggregate \$1000)	G	KENT	WA
980325436					

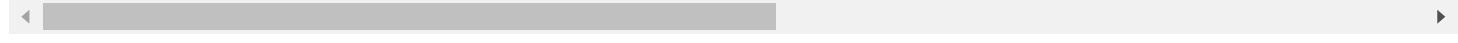
b) Primary (7 Days -- 7/26/2016 to 8/2/2016)

AVISTA CORP.	2016-08-02	1000	G	SPOKANE	WA	992203727
AVISTA CORP.	2016-08-02	1000	P	SPOKANE	WA	992203727
BROADBAND COMM ASSN OF WA PAC	2016-08-02	1000	G	SEATTLE	WA	98104
BROADBAND COMM ASSN OF WA PAC	2016-08-02	1000	P	SEATTLE	WA	98104
LUMMI COMMERCIAL COMPANY	2016-08-02	1000	P	BELLINGHAM	WA	98226
LUMMI COMMERCIAL COMPANY	2016-08-02	1000	G	BELLINGHAM	WA	98226
THE BOEING COMPANY	2016-08-02	1000	G	ARLINGTON	VA	22202
TULALIP TRIBES OF WA GENERAL FUND	2016-08-02	1000	P	TULALIP	WA	98271

While there may very well be additional violations I missed in Morris' campaign filings, the evening is getting late, so I will call this adequate for now. Any further violations I will amend shortly before notifying the Attorney General's office of this serial violator of campaign finance and campaign transparency laws.

Best Regards,

Glen Morgan



**2 Attachments**

PDF [Whois morris...](#)  
( 321 KB )

PDF [MorrisWebsit...](#)  
( 182 KB )

## File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported an hour ago (Thu, 26 Jan at 12:58 PM) via Portal Meta

Please treat this additional violation of RCW 42.17A by Jeff Morris as an addendum to the more comprehensive complaint I filed last night. For ease of PDC tracking (and for the AG's office) this should be included under the same tracking number and investigation process. If you have any concerns about that or questions, please contact me directly.

### 15) Late Filing of F1 Personal Statement (Violation of RCW 42.17A.700(1))

Jeff Morris failed to submit an accurate F1 report to the PDC by 4/15/2016, as required by RCW 42.17A.700(1).

This report was not submitted until 4/22/2016, well past the statutory deadline. (See attached F1.)

Best Regards,

Glen Morgan

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### 1 Attachment

PDF [MorrisJeffre...](#)  
( 753 KB )





**Jeff Morris**  
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#### WELCOME TO MORRISCAMPAIGN.COM

It is my great privilege to represent the citizens of Skagit, Whatcom, and San Juan counties. I am asking you for that privilege again. I have challenged our State government to get out of the box and approach problems differently.

It is my hope that changing business as usual will solve problems more efficiently and effectively. I have new proposals that will consolidate management and put more people in front line positions. I will also continue my work in technology, telecommunications and energy to get you the newest technology quickly and energy cheaply. I hope to have your vote.



If you need to contact the campaign right away, please email [jeff@morriscampaign.com](mailto:jeff@morriscampaign.com).

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