

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported a day ago (Sun, 12 Mar at 12:12 AM) via Portal Meta

To Whom it May Concern --

It has come to my attention that the PAC "People for Thurston" and EWU Trustee Jay Manning have committed additional violations of RCW 42.17A.

1) Failure to report in-kind contribution of PO Box. (Violation of RCW 42.17A.235, .235 (1))

On his original C1 (filed 10/10/16) , Manning listed "PO Box 3039 Lacey, WA 98509" as his Committee's official mailing address.

The rental of this PO Box likely cost \$80, perhaps more when tax is factored in. Manning was likely the person who paid for the PO Box rental.

Per RCW 42.17A.235(1), this in-kind contribution should have been reported on the same day Manning filed his C1. Unfortunately, he never reported it.

Manning must amend his reports to reflect this in-kind contribution immediately.

2) Failure to report in-kind contribution of mailing list. (Violation of RCW 42.17A.235)

Manning's committee sent out multiple mailers to registered voters within Thurston County.

He used mailing lists to target specific voters in an effort to win the maximum number of voters per dollar spent. Mailing lists have real market value, and many candidates actually pay hundreds of dollars for mailing lists from vendors such as L2.

Unfortunately, because Manning failed to report the expenditure for said mailing lists, or the in-kind contribution of mailing lists from some outside entity, he is in violation of **RCW 42.17A.235**. Manning must amend his reports to include the source of his mailing lists. (see: State of *Washington vs. Sam Hunt - Thurston Superior Court Case #17-2-00849-34*)

3) Failure to report the accurate date of contributions received. (Violation of RCW 42.17A.235, .240)

State law requires that committees report the accurate date of when contributions were received.

Manning's committee -- by its own admission -- has failed to do this in at least one instance. Unfortunately, **I believe that Manning's treasurer misreported the dates received for every single contribution they received.**

In the Committee's response to **PDC complaint #12110** , Manning's legal team wrote:

"The contribution dated October 18, 2016 was incorrectly identified by the treasurer of the Committee as being received on that date. The check was dated 10/18/2016. The PAC received the check the evening of 10/19/2016. It was deposited and reported within 48 hours of receipt, on 10/21/2016. When it was deposited, the treasurer incorrectly cited the date on the check instead of the date of the receipt of the check."

Due to this response, I believe that Manning's committee has systemically misreported the dates that contributions have been received. This is a serious violation and appears to indicate there may have been other instances where LMCs or C3s were not filed in a timely fashion.

By falsifying the dates that contributions were received, Manning's committee has also potentially violated **RCW 42.17A.750 (2)(c)**, which is a class C felony.

4) Failure to adequately estimate the cost of legal fees. (Violation of RCW 42.17A.235)

On his latest C4, Manning estimated his outstanding legal debt at \$2784.25.

This appears to be an inaccurate estimation of debt. Manning's attorneys have spent many more billable hours dealing with these legal issues than he is reporting.

The PDC should subpoena Manning's legal invoices to verify whether or not he is hiding additional debts from public scrutiny.

5) Failure to report in-kind contribution of administrative assistance. (Violation of RCW 42.17A.235)

On Manning's original C1, he lists Amanda Fisher as a ministerial campaign treasurer. This role includes mostly administrative responsibilities, such as campaign finance reporting.

Amanda Fisher is an administrative assistant at the South Puget Sound Community College, where she receives payment for the work she performs.

Because Fisher provides administrative assistance at a market rate, Manning needs to disclose the many hours that Fisher has spent on Committee work as an in-kind contribution.

6) Failure to disclose offices held. (Violation of RCW 42.17A.700, see WAC 390-24-010, 150)

State law requires that state officials disclose the offices that they hold on corporations, boards, etc.

Manning is a board member (chair) of the Washington Environmental Council. (See attached.)

Unfortunately, Manning failed to report this on his F1, which is a violation of state law.

I urge the PDC and AG to investigate these serious allegations immediately.

Best Regards,

Glen Morgan

2 Attachments

- pdf

[Jay Manning_...](#)

(81.5 KB)

- pdf



Jay Manning, Board Chair

Jay rejoined Cascadia Law Group in 2011 after more than six years as Director of the Washington Department of Ecology and Governor Gregoire's Chief of Staff. His practice focuses on environmental and energy matters, providing consulting, legislative, and legal assistance. In Governor Gregoire's office, Jay worked closely with the Governor and her Cabinet and Senior Staff to address budgetary and public policy challenges facing state government. As Director at Ecology, Jay focused on managing the state's water resources, including creation of the Office of Columbia River, guiding the effort to bring the Puget Sound back to good health by 2020, including the creation of the Puget Sound Partnership and addressing climate change and the daunting threat it poses to Washington's economy and environment. Jay co-chaired the Washington State Blue Ribbon Panel on Ocean Acidification in 2012, which led to an Executive Order directing the state's implementation of the panel's recommendations for a coordinated, regional response. Jay is Board chair for Washington Environmental Council, a member of the Board of the Ruckelshaus Center, a member of the Board of Advisors for University of Washington's College of the Environment and vice chair of the Puget Sound Partnership's Leadership Council. Jay has been married to his wife Lorraine for over 35 years and has three grown children and two lovely and brilliant grandchildren. He enjoys riding his bicycle, traveling, reading, cooking, and spending time with family and friends.

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