

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported 8 days ago (Mon, 18 Sep at 11:58 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that Jefferson County Commissioner David Sullivan has willfully committed multiple violations of RCW 42.17A in his recent illegal misuse of campaign funds as follows:

1) Illegal personal misuse of campaign surplus funds. (Violation of RCW 42.17A.430, WAC 390-16-238)

On December 2, 2016, David Sullivan's campaign wrote a check to himself for \$800.90 , and described this payment as "for future campaign. Close Bank Account." (See **attached C4 PDC ref#100739763**). It is possible that Sullivan intended to treat these funds as "surplus" in which case he should have disposed of these campaign funds in one of the many legal options outlined in **RCW 42.17A.430**, however he chose to follow none of these legal paths and violated the law instead.

It should be noted that Sullivan appears to have illegally used these surplus funds for personal use in violation of **WAC 390-16-238**.

2)Illegal use of candidate campaign funds transferred to another political committee (Violation of RCW 42.17A.430(8))

On August 4, 2017, David Sullivan's campaign wrote a check to Homes Now PAC for \$800.60 (See **attached C3 PDC ref #100781350**). This is clearly a violation of **RCW 42.17A. 430(8)** which explicitly prohibits this type of illegal transfer of campaign funds from one candidate's campaign to another political committee.

It should also be noted that in the process of committing these two significant violations of **RCW 42.17A.430**, Sullivan has apparently lost 30 cents of his campaign funds. These missing funds should also be located by Sullivan and reported to the Public Disclosure Commission to ensure the people have total transparency on how he has been using or misusing these campaign funds.

The PDC should investigate the possibility that Jefferson County Commissioner David Sullivan 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

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100781350

08-08-2017

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Homes Now

Mailing Address
 P.O. Box 648

City Zip + 4 Office Sought (candidates) Election Date
 Port Townsend, WA 98368 2017

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
08/04/17	COMMITTEE TO ELECT DAVID 462 Baycliff Drive Port Townsend, WA 98368				800.60	800.60
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			800.60	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

800.60

4. Date of Deposit

08/07/17

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Deborah Pedersen

08-08-2017

Treasurer's Daytime Telephone No.: (360) 385-5147

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	100739763
	01-05-2017

Candidate or Committee Name (Do not abbreviate. Include full name)
DAVID SULLIVAN (David Sullivan Reelection Committee)

Mailing Address
 1240 W SIMS WAY #96
 City
 PORT TOWNSEND, WA

Zip + 4	Office Sought (Candidates)	Election Date	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?
98368	COUNTY COMMISSIONER	2016	
Report Period Covered	From (last C-4)	To (end of period)	Final Report?
	12/01/16	12/31/16	Yes X No

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$		1,588.51
2. Cash received (From line 2, Schedule A)	\$	0.00	
3. In kind contributions received (From line 1, Schedule B).....		0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			0.00
5. Loan principal repayments made (From line 2, Schedule L).....		0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)		0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			1,588.51
9. Total pledge payments due (From line 2, Schedule B).....		0.00	

EXPENDITURES		
10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		787.61
11. Total cash expenditures (From line 4, Schedule A)	800.90	
12. In kind expenditures (goods & services) (From line 1, Schedule B)	0.00	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		800.90
14. Loan principal repayments made (From line 2, Schedule L).....	0.00	
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00	
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		1,588.51

CANDIDATES ONLY	Name not on ballot	CASH SUMMARY		
Won	Lost	Unopposed		
Primary election <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Cash on hand (Line 8 minus line 17)	0.00
General election <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
Treasurer's Daytime Telephone No.:			19. Liabilities: (Sum of loans and debts owed)	0.00
(360) 531-4003			20. Balance (Surplus or deficit) (Line 18 minus line 19)	0.00

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
DAVID SULLIVAN	01/10/17	GAIL KRENTZMAN	

CASH RECEIPTS AND EXPENDITURE

SCHEDULE A
 to C4
(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date
 DAVID SULLIVAN (David Sullivan Reelection Committee) 12/01/16 12/31/16

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 0.00

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE	C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering	P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead
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3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
12/02/16	DAVID SULLIVAN 1240 W Sims Way #96 Port Townsend, WA 98368		For Future Campaign. Close Bank Account.	800.90

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
Enter also on line 11 of C4 \$ 800.90