

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Tue, 19 Sep at 11:39 PM) via Portal [Meta](#)

To Whom it May Concern --

It has come to my attention that the Kitsap County Democratic Central Committee has habitually and willfully committed frequent and multiple violations of RCW 42.17A.

This notice and the attached spreadsheet detail numerous apparent violations of various provisions of Washington's campaign finance law by the Kitsap County Democratic Central Committee. The Kitsap County Democratic Central Committee has apparently violated **RCW 42.17A** as follows:

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 Kitsap County Democratic Central Committee has failed on numerous occasions to do this. (See **Exhibits A - "Illegally Late filed C3 and C4 reports"**).

Cumulative total for reports past statutory deadline is 1,929 days late.

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 Kitsap County Democratic Central Committee illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

Cumulative total for reports that did not properly report debt is 7,299 days late and counting.

3) Failure to properly break down expenditures. (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 and reported as such. 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 Kitsap County Democratic Central Committee illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

Cumulative total for reports that did not properly break down expenditures is 4,259 days late and counting.

The PDC should investigate the possibility that the Kitsap County Democratic Central Committee 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

3 Attachments

Exhibit A -- Illegally Late filed C3 and C4 reports

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100739502	C4	Y		4/11/2016	1/3/2017	267
2	100734753	C3	Y		5/10/2016	11/8/2016	182
3	100734754	C3	Y	4/5/2016	5/10/2016	11/8/2016	182
4	100784685	C4	Y		6/10/2017	9/3/2017	85
5	100653535	C4	N		6/10/2015	8/22/2015	73
6	100708836	C4	Y		5/10/2016	7/17/2016	68
7	100688398	C4	N		2/10/2016	4/5/2016	55
8	100666489	C4	N		9/10/2015	11/1/2015	52
9	100784689	C3	Y	7/10/2017	7/17/2017	9/3/2017	48
10	100784688	C3	Y	7/10/2017	7/17/2017	9/3/2017	48
11	100784691	C3	Y	7/10/2017	7/17/2017	9/3/2017	48
12	100784687	C3	Y	7/17/2017	7/24/2017	9/3/2017	41
13	100653536	C4	N		7/14/2015	8/22/2015	39
14	100782832	C4	Y		7/11/2017	8/19/2017	39
15	100630741	C3	Y	1/5/2015	2/10/2015	3/20/2015	38
16	100782593	C3	Y	7/7/2017	7/10/2017	8/16/2017	37
17	100706768	C3	N	6/2/2016	6/6/2016	7/11/2016	35
18	100706781	C4	Y		6/10/2016	7/11/2016	31
19	100635638	C4	N		4/10/2015	5/10/2015	30
20	100668978	C4	N		10/27/2015	11/26/2015	30
21	100740217	C3	N	11/29/2016	12/10/2016	1/8/2017	29
22	100784690	C3	Y	7/31/2017	8/7/2017	9/3/2017	27
23	100688399	C4	N		3/10/2016	4/5/2016	26
24	100653537	C4	N		7/28/2015	8/22/2015	25
25	100735027	C4	N		10/18/2016	11/10/2016	23
26	100739348	C3	N	11/23/2016	12/10/2016	1/1/2017	22
27	100706767	C3	N	6/15/2016	6/20/2016	7/11/2016	21
28	100666490	C4	N		10/13/2015	11/1/2015	19
29	100715614	C4	N		7/26/2016	8/14/2016	19
30	100753491	C4	Y		3/10/2017	3/27/2017	17
31	100734751	C3	Y	10/22/2016	10/24/2016	11/8/2016	15
32	100706780	C3	Y	6/22/2016	6/27/2016	7/11/2016	14
33	100742293	C4	N		1/10/2017	1/23/2017	13
34	100703597	C3	N	5/16/2016	6/10/2016	6/23/2016	13
35	100703598	C3	N	5/16/2016	6/10/2016	6/23/2016	13
36	100703608	C3	N	5/16/2016	6/10/2016	6/23/2016	13
37	100703616	C3	N	5/17/2016	6/10/2016	6/23/2016	13
38	100715611	C3	N	7/31/2016	8/1/2016	8/14/2016	13
39	100710080	C4	N		7/12/2016	7/24/2016	12
40	100703521	C3	N	5/5/2016	6/10/2016	6/22/2016	12
41	100703520	C3	N	5/31/2016	6/10/2016	6/22/2016	12
42	100630736	C3	Y	2/23/2015	3/10/2015	3/20/2015	10
43	100630737	C3	Y	2/4/2015	3/10/2015	3/20/2015	10
44	100630738	C3	Y	2/3/2015	3/10/2015	3/20/2015	10
45	100630739	C3	Y	2/3/2015	3/10/2015	3/20/2015	10
46	100630740	C3	Y	2/2/2015	3/10/2015	3/20/2015	10
47	100725834	C3	N	9/30/2016	10/3/2016	10/12/2016	9
48	100725835	C3	N	9/30/2016	10/3/2016	10/12/2016	9
49	100706766	C3	N	6/30/2016	7/4/2016	7/11/2016	7
50	100734285	C3	N	10/25/2016	10/31/2016	11/7/2016	7
51	100756528	C4	N		4/10/2017	4/16/2017	6
52	100710087	C3	N	7/12/2016	7/18/2016	7/24/2016	6
53	100715612	C3	N	8/4/2016	8/8/2016	8/14/2016	6
54	100715613	C3	N	8/5/2016	8/8/2016	8/14/2016	6
55	100756527	C3	N	3/30/2017	4/10/2017	4/16/2017	6
56	100643507	C3	N	5/9/2015	6/10/2015	6/15/2015	5
57	100769430	C3	N	5/17/2017	6/10/2017	6/14/2017	4
58	100624297	C4	Y		1/12/2015	1/15/2015	3
59	100725836	C3	N	10/5/2016	10/10/2016	10/12/2016	2
60	100737591	C3	N	11/14/2016	12/10/2016	12/12/2016	2
61	100737590	C3	N	11/30/2016	12/10/2016	12/12/2016	2

Approx. Cumulative Days Late

1929

Exhibit B -- Illegal failure to timely report Debt

Violation # Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. da
1 EXCEL BUSINESS SYSTEMS INC	2/13/2015	\$275.83	PRINTING	This should have been reported as debt on the C4 covering the time period of January 2015.	952
2 OLYMPIC COLLEGE	5/13/2015	\$1,793.55	OLYMPIC COLLEGE CATERING FOR AUCTION NIGHT	This should have been reported as debt on the C4 covering the time period of April 2015.	862
3 INOIPRINTS SCREEN PRINTS	9/22/2015	\$419.08	SCREEN PRINTING	This should have been reported on the post-primary C4.	740
4 CITY OF BREMERTON	2/17/2016	\$1,260.00	RENTAL OF CONVENTION CENTER FOR CHRISTMAS DINNER	This should have been reported as debt on the C4 covering the time period of January 2016.	587
5 KITSAP INDUSTRIAL PARK	3/9/2016	\$7,200.00	HEADQUARTER \KITSAP DEMOCRATS	This should have been reported as debt on the C4 covering the time period of February 2016.	558
6 DR DONS BUTTONS	3/17/2016	\$799.05	POLITICAL BUTTONS	This should have been reported as debt on the C4 covering the time period of February 2016.	
7 CRESCENT MOON CATERING	3/17/2016	\$3,166.79	AUCTION CATERING	This should have been reported as debt on the C4 covering the time period of February 2016.	
8 KITSAP CONFERENCE CENTER	3/29/2016	\$275.00	RENT	This should have been reported as debt on the C4 covering the time period of March 2016.	
9 KITSAP COUNTY PARKS	4/1/2016	\$495.00	PARK RENTAL	This should have been reported as debt on the C4 covering the time period of March 2016.	526
10 CENTRAL KITSAP SCHOOL DISTRICT	4/18/2016	\$1,180.00	RENTAL BUILDING SPACE FOR CAUCUS MEETINGS	This should have been reported as debt on the C4 covering the time period of March 2016.	
11 CENTRAL KITSAP SCHOOL DISTRICT	4/18/2016	\$610.00	RENT OF LKAHOWYE COMMONS FOR CAUCUS MEETINGS	This should have been reported as debt on the C4 covering the time period of March 2016.	
12 NGP VAN	5/3/2016	\$450.00	VOTER INFORMATION SOFTWARE	This should have been reported as debt on the C4 covering the time period of April 2016.	496
13 WILEY JEFF	5/9/2016	\$349.67	OFFICE SUPPLIES FOR 2016 KITSAP CO. PRECINCT CAUCUSES/CONVENTION	This should have been reported as debt on the C4 covering the time period of April 2016.	
14 NORTH KITSAP SCHOOL DISTRICT	5/15/2016	\$350.00	PRECINCT CAUCUS RENTAL FEE	This should have been reported as debt on the C4 covering the time period of April 2016.	
15 BREMERTON SCHOOL DISTRICT	5/15/2016	\$479.25	RENTAL FEES/PRECINCT CAUCUSES/BREMERTON HIGH SCHOOL	This should have been reported as debt on the C4 covering the time period of April 2016.	
16 NORTH KITSAP SCHOOL DISTRICT	5/15/2016	\$350.00	PRECINCT CAUCUS RENTAL FEES/KINGSTON HIGH SCHOOL	This should have been reported as debt on the C4 covering the time period of April 2016.	
17 NORTH KITSAP SCHOOL DISTRICT	5/15/2016	\$360.00	NORTH KITSAP HS/PRECINCT CAUCUS RENTAL	This should have been reported as debt on the C4 covering the time period of April 2016.	
18 SOUTH KITSAP SCHOOL DISTRICT	5/17/2016	\$610.50	PRECINCT CAUCUS RENTAL FEES/JOHN SEDGWICK JUNIOR HIGH	This should have been reported as debt on the C4 covering the time period of April 2016.	
19 BAINBRIDGE ISLAND SCHOOL DISTRICT	6/10/2016	\$382.50	PRECINCT CAUCUS RENTAL FEES/WILKES, SAKAI AND BAINBRIDGE HS	This should have been reported as debt on the C4 covering the time period of April 2016.	466
20 BAINBRIDGE ISLAND SCHOOL DISTRICT	6/16/2016	\$1,091.25	MARCH, 2016 PRECINCT CAUCUS RENTAL FEES	This should have been reported as debt on the C4 covering the time period of May/June 2016.	
21 NGP VAN	7/13/2016	\$450.00	NGP VAN, INC./QUARTERLY SERVICE FEE	This should have been reported as debt on the 21 day pre-primary C4.	434
22 CENTRAL KITSAP SCHOOL DISTRICT	7/13/2016	\$1,830.00	COUNTY CONVENTION RENTAL FEES	This should have been reported as debt on the 21 day pre-primary C4.	
23 SOMMERHAUSER JIM	7/23/2016	\$313.40	BUTTONS FOR KITSAP CO. FAIR BOOTH	This should have been reported as debt on the 21 day pre-primary C4.	
24 CENTURY LINK	7/27/2016	\$297.63	OFFICE TELEPHONE/INTERNET SERVICE	This should have been reported as debt on the 7-day pre-primary C4.	420
25 KITSAP DEMOCRATIC WOMEN	8/1/2016	\$650.00	COST SHARING/HILLARY CLINTON SIGNS	This should have been reported as debt on the 7-day pre-primary C4.	
26 SILVERDALE BEACH HOTEL	8/30/2016	\$1,422.35	MARCH 2016 DINNER/AUCTION	This should have been reported as debt on the 7-day pre-primary C4.	
27 OVERNIGHT PRINTING & GRAPHICS, INC	10/20/2016	\$10,601.02	PRINTING/MAILING OF SAMPLE BALLOT POSTCARD	This should have been reported as debt on the 21 day pre-general C4.	336
28 HONOR BAR	11/8/2016	\$1,000.00	ELECTION NIGHT PARTY	This should have been reported as debt on the 7 day pre-general C4.	322
29 KITSAP COUNTY PARKS AND RECREATION	11/21/2016	\$1,925.00	2017 MEETING SPACE RENTAL	This should have been reported as debt on the 7 day pre-general C4.	
30 KITSAP CONFERENCE CENTER	12/2/2016	\$2,178.79	2016 HOLIDAY PARTY	This should have been reported as debt on the C4 covering the time period of November 2016.	281
31 KITSAP COUNTY PARKS	3/28/2017	\$495.00	KITSAP CO. FAIR BOOTH RESERVATION	This should have been reported as debt on the C4 covering the time period of February 2017.	193
32 KITSAP GOLF & COUNTRY CLUB	7/15/2017	\$3,517.17	GALA DINNER AND AUCTION	This should have been reported as debt on the 21 day pre-primary C4.	70
33 KITSAP COUNTY PARKS	8/21/2017	\$280.00	EXTRA FAIR PASSES & PKG TICKETS	This should have been reported as debt on the 7-day pre-primary C4.	56
34 SOMMERHAUSER JAMES	8/25/2017	\$488.28	TOP PUN INVOICE	This should have been reported as debt on the 7-day pre-primary C4.	
Total		\$47,346.11		Approx. Cumulative Days Late	7299

ys late

Exhibit C -- Illegal Failure to breakdown expenditures.

Violation #/Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1 SOMMERHAUSER GINGER	2/4/2015	\$ 96.68	PRINTER INK AND PAPER	Failure to identify subvendor.	100629774	924
2 SOMMERHAUSER JIM	7/23/2016	\$ 313.40	BUTTONS FOR KITSAP CO. FAIR BOOTH	Failure to identify subvendor.	100715614	420
3 WOODS KATHERINE	3/17/2016	\$ 70.00	DOMAIN NAME	Failure to identify subvendor.	100739502	526
4 SOMMERHAUSER JIM	8/21/2016	\$ 167.93	CANDY PURCHASE FOR KITSAP CO. FAIR BOOTH	Failure to identify subvendor.	100720829	372
5 OLSON CARL	8/21/2016	\$ 176.00	KITSAP CO. FAIR BOOTH INSURANCE	Failure to identify subvendor.	100720829	
6 CRAWFORD LILLIAN	8/21/2016	\$ 18.48	KITSAP CO. DEM. PICNIC SUPPLIES	Failure to identify subvendor.	100720829	
7 OLSON CARL	8/22/2016	\$ 89.98	KITSAP CO. DEM PICNIC/CHICKEN	Failure to identify subvendor.	100720829	
8 OLSON CARL	8/22/2016	\$ 220.00	KITSAP CO. FAIR/PARKING AND ADMISSION FOR BOOTH VOLUNTEERS	Failure to identify subvendor.	100720829	
9 BAUER SANDRA	5/11/2015	\$ 78.84	PRINTING FOR AUCTION	Failure to identify subvendor.	100653535	832
10 SOMMERHAUSER GINGER	5/9/2016	\$ 180.75	PRINTED MATERIALS/2016 KITSAP CO. CONVENTION	Failure to identify subvendor.	100706781	466
11 WILEY JEFF	5/9/2016	\$ 349.67	OFFICE SUPPLIES FOR 2016 KITSAP CO. PRECINCT CAUCUSES/CONVENTION	Failure to identify subvendor.	100706781	
12 CRAWFORD LILLIAN	5/9/2016	\$ 200.00	FOOD/BEVERAGES FOR 2016 KITSAP CO. CONVENTION	Failure to identify subvendor.	100706781	
13 FOSTER LYNDIA	5/21/2016	\$ 136.64	REIMBURSEMENT/6TH CD CAUCUS EXPENSES	Failure to identify subvendor.	100706781	
14 BARTLEY DONALD	9/19/2016	\$ 17.10	REIMBURSEMENT/FIRE EXTINGUISHER PURCHASE	Failure to identify subvendor.	100725837	336
15 SOMMERHAUSER JIM	1/30/2017	\$ 60.86	COPY PAPER REIMBURSEMENT	Failure to identify subvendor.	100746941	221
16 OLSON CARL	3/2/2017	\$ 134.00	PO BOX FEE REIMBURSEMENT	Failure to identify subvendor.	100756528	162
17 SOMMERHAUSER GINGER	3/1/2017	\$ 54.35	TONER CARTRIDGE REIMBURSEMENT	Failure to identify subvendor.	100756528	
18 SOMMERHAUSER GINGER	3/20/2017	\$ 51.30	TONER PURCHASE REIMBURSEMENT	Failure to identify subvendor.	100756528	
Total		\$ 2,415.98			Approx. Cumulative Days Late	4259