

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Sat, 4 Nov at 11:30 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that Jim Cooper, a candidate for the Olympia City Council has habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

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, Jim Cooper has failed to do this during his current campaign for the Olympia City Council.

There is an exception to this rule if the candidate qualifies for the mini-reporting option. In order to qualify for this option, the candidate must qualify for all the conditions set forth in **WAC 390-16-115** and **WAC 390-16-105**.

One of the most important criteria in order to qualify for this exception is that the candidate must accept **no more than \$500 in aggregate** from any one contributor, excluding the candidate. **WAC 390-16-105 (1)(b)**.

Despite this requirement, **Jim Cooper accepted \$750 in aggregate from the Teamsters Legislative League**. See attachment. He did not refund this over-limit contribution within the time period allotted to him by law.

The Teamsters Legislative League's own PDC filings also attest to the fact that Cooper accepted over the limit. (See **PDC reports # 100776034, #100785816**). I was also able to confirm this over limit contribution during an inspection of Jim Cooper's books (which I requested under **RCW 42.17A.235(4)** and conducted on Thursday, November 2 from 1-2pm at the private law firm of Bean, Gentry, Wheeler & Peternell located in Olympia)

This is a serious violation of state law that must be immediately rectified by having Cooper backfile all required C3 and C4 reports.

2) Failure to update C1 within time period required by law. (Violation of RCW 42.17A.205)

State law requires that material change in information previously submitted in a statement of organization (C1) shall be reported to the commission within the ten days following the change. This includes a change in the treasurer as well as the address where the campaign books may be viewed.

On information and belief, it appears Shawn Meyers (who is a state employee not capable of performing campaign work such as depositing campaign checks during working hours) is not Jim Cooper's actual treasurer. If true, this information was required to be changed on Cooper's C1 form.

Several errors and mistakes found in the Jim Cooper campaign books did not reflect the skills and capabilities that I have observed when Shawn Meyers is actually the real Treasurer for a campaign. For example, a \$300 donation made by the WPEA to the Cooper campaign was listed as received 6/7/2017, but it was indicated that this donation was deposited on 5/16/2017 - three weeks before it was "received." These types of mistakes are just not ones I have observed Shawn Meyers make in the past, and it is a strong indication that she is actually not the true treasurer for the Cooper campaign.

3) Illegal depositing of campaign funds into bank account by person other than the treasurer or deputy treasurer. (Violation of RCW 42.17A.220 (1))

On information and belief, Shawn Meyers (who is a state employee not capable of performing campaign work such as depositing campaign checks during working hours) is not the actual treasurer of the campaign.

As such, it is highly likely that Jim Cooper (or unlisted designee) personally deposited campaign checks into the campaign bank account.

The PDC should investigate the possibility that Jim Cooper 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.

Since the AG is already in litigation with Jim Cooper (see **Thurston Superior Court Case #16-2-04960-34**), it might just make sense to add these additional violations as another amended complaint to the existing court case.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan