

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Thu, 30 Nov at 12:24 AM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that Rep. Sharon Wylie and her candidate committee have 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, Rep. Sharon Wylie has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

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.

Rep. Sharon Wylie illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

3) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)

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** and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4.

Rep. Sharon Wylie's committee illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

4) Illegal donation of campaign funds to candidate/political committees (Violation of RCW 42.17A.430(8)).

State law prohibits candidates from donating their campaign funds to other candidate/political committees, with a handful of narrow exemptions.

Unfortunately, Wylie made numerous expenditures to candidate/political committees that exceed the fair market value of the items her campaign received, thus incurring an illegal contribution (as defined in **RCW 42.17A.005**) to these committees.

Please see below as evidence of illegal expenditures/donations:

Vendor	Date	Amount	Description
CLARK COUNTY DEMOCRATS	2016-05-12	700	FORWARD TOGETHER DINNER
CLARK COUNTY DEMOCRATS	2016-11-07	500	CONTRIBUTION TO ELECTION NIGHT PARTY
YOUNG DEMOCRATS OF WASHINGTON	2016-02-20	500	MINOR PARTY COMMITTEE
WASHINGTON STATE HOUSE DEMOCRATS	2016-06-06	315.99	REGISTRATION FEE FOR STATE CAUCUS
YOUNG DEMOCRATS OF WASHINGTON	2016-08-03	200	PRIMARY NIGHT PARTY

The PDC should investigate the possibility that Rep. Sharon Wylie 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.

Please note, as requested by PDC staff, I have provided all three spreadsheet attachments in both Excel and PDF formats for staff convenience.

Best Regards,

Glen Morgan