

File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Wed, 11 Apr at 10:50 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that former Thurston County Commissioner Karen Valenzuela has committed significant and serious violations of **RCW 42.17A** over the past few years since she lost her campaign in 2014. Primarily these violations involve the misuse of her surplus funds leftover from that race. These violations are specifically confirmed by Valenzuela's response dated March 28, 2018 to the PDC regarding PDC Complaint #32724. The detailed allegations are as follows:

1. Failure to properly dispose of surplus funds and failure to report illegal disposal of surplus funds(Violation of RCW 42.17A.430)

Karen Valenzuela has claimed in her March 28, 2018 response to PDC complaint #32724 that she gave \$900 to Thurston Environmental Voters in "December 2014." In addition to the fact that this was not an appropriate use of surplus funds, and it wasn't reported to the PDC, this also appears to be a false statement because the Thurston Environmental Voters didn't even exist in "December 2014." In fact, the Thurston Environmental Voters filed their first C1PC on March 13, 2015 (See **attached copy of C1PC form**). Also, please note that the Thurston Environmental Voters never reported this \$900 from Valenzuela on their first C3 (See **PDC Tracking #100632342**).

2. Failure to report the legal dispersal of surplus funds (Violation of RCW 42.17A.240(10) and Violation of RCW 42.17A.430)

Valenzuela claimed in her March 28, 2018 response to PDC complaint #32724 that she gave "\$9,170 to Thurston County Democrats, Nov 2016." This claim appears to be supported by the Thurston County Democrats in their C3 filed November 3, 2016 (see **PDC Tracking # 100733867**). However, the statute requires large last minute contributions to be reported by both parties, and Valenzuela failed to report this donation at any time. Please note, this is a significant violation due to both the size of the contribution, and the timing, just 5 days before the election. As the PDC is aware, failure to report contributions within 30 days of an election is considered a particularly egregious violation of the state's campaign finance and transparency laws. In this instance Valenzuela clearly violated the statute and apparently didn't make even a partial attempt to comply.

3. Failure to report legal dispersal of surplus funds (Violation of RCW 42.17A.240(10) and Violation of RCW 42.17A.430)

It is legal for a candidate to transfer surplus funds to charitable organizations (**RCW 42.17A.430(4)**), **however the candidate still must report these transfers and dispersals**. Valenzuela, according to her own March 28, 2018 response to PDC complaint #32724, she claims that "\$1000 to Pizza Klatch, Dec 2015" and "\$500 to Pizza Klatch, Nov 2016" This total of \$1500 to "Pizza Klatch" (which is a registered charity and would qualify as a legal recipient of these surplus funds under **RCW 42.17A.430(4)**) could only be verified and

known to the public if Valenzuela had reported the financial transfers, which she failed to do. The imprecise nature of the information provided by Valenzuela to the PDC in this response also provides additional concern. Please note these reports are well over 1800 days late alone.

Finally, Valenzuela appears to be willfully and knowingly providing false or misleading information to PDC staff.

For example, as can be seen from her final C4 (See **PDC Tracking #100623105**), she ended the campaign and the year with \$10,979.54 in her surplus funds account. However, in her March 28, 2018 response to PDC complaint #32724, she claims distributing over \$11,770, which is a sizeable discrepancy. **Both reports from Valenzuela can't be accurate. One or the other is false.**

Another example is **the false claim to have provided \$900 to Thurston Environmental Voters at a time when that organization did not exist** and has never reported receipt of these funds. This should encourage PDC staff to investigate the Thurston Environmental Voters PAC to see if these funds were either received and not reported, or whether Valenzuela is attempting to deceive the PDC.

The PDC should investigate whether Karen Valenzuela committed the above violations maliciously and/or willfully (and continues to do so with deceptive and dishonest responses) 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 my email address is glen@wethegoverned.com if you have any questions or need additional allegations.

Best Regards,

Glen Morgan