

ile a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Wed, 11 Apr at 11:37 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that the WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC , its treasurer, its officers, and any parent or subsidiary organization associated with it have once again, committed violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter may have occurred beyond what I have identified below.

1) Failure to file accurate, timely 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, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (**WAC 390**).

Specifically, the Washington & Northern Idaho District Council of Laborers PAC has failed to report either the in-kind value or the actual payment to their law firm – Schwerin Campbell Barnard Iglitzin & Lavitt llp incurred while defending themselves from a major campaign finance lawsuit filed last year by the Washington State Attorney General’s office against this PAC (**See Thurston Superior Court #17-2-04408-34**). This case was settled for \$36,610 on Sept 22, 2017 (see **attached stipulation and agreed judgment**) . Please note the lawfirm’s signature at the bottom of the stipulation and agreed judgment.

The PAC did report the fine and penalties paid to the state of Washington, but they have never reported any costs associated with the legal defense of this very significant investigation and lawsuit filed by the Washington State Attorney General’s office against them (**See PDC Report # 100799763**).

Please note, there is a growing concern that this law firm has been colluding to obfuscate their legal fees and/or act like a dark money contributor through the use of unreported in-kind legal contributions to PACs like the Washington & Northern Idaho District Council of Laborers PAC (**See PDC Complaint #31219**).

The PDC should investigate the very real possibility that the respondent 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