

Complaint Description

File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Thu, 9 Aug at 11:56 PM)

To Whom it May Concern --

It has come to my attention that **Sheryl Miller** running for Pend Orielle Commissioner, Position 3, and her Treasurer, Denise Teeples 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 C4 reports. (Violation of RCW 42.17A.235)

Miller checked the full reporting requirement for this campaign on her C1 (PDC **Tracking # 100845900**). 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**).

Unfortunately, the Miller campaign **has failed to file ANY C-4 reports** detailing campaign expenditures.

At a minimum, the candidate has failed to report the following expenditures:

1. Filing fee – a filing fee is required for this position, and Miller wouldn't be able to run for office without paying this fee. This fee was not reported as an expenditure
2. Campaign Signs, t-shirts, buttons, stickers, and similar campaign expenditures would need to be reported and they have not been reported.
3. Brochures and handouts – This candidate has produced some brochures and literature. Nothing has been reported.
4. Website and website development – This candidate may have reserved a campaign website, although it isn't easy to find. The expense of reserving the URL, hosting the site, developing the website, paying for the on-line contribution vendor – none of these costs are reported.
5. Professional Photography – This is another campaign expenditure not reported by this campaign.
6. Facebook boosted posts – This campaign has a dedicated Facebook page, and they may have boosted campaign posts and information as ads on Facebook, which would also need to be reported with adequate detail.
7. Spokane Teachers Credit Union banking costs – the Spokane Teachers Credit Union is identified as the bank account for this campaign on Miller's C1, and they charge fees related to new bank accounts, and this information would need to be reported as an expenditure as well.
8. PO Box – This campaign has identified a Post Office Box as the primary mailing address for this campaign and these costs would need to be reported as well.

There are likely additional expenditures which have not been detailed here which will also need to be reported to the PDC. Please note this critical information was withheld from the public during the crucial 60 day window before the contested primary election in which she was able to retain a top-two position.

2) Failure to file accurate, timely C3 reports. (Violation of RCW 42.17A.235)

When adding up the likely hidden and secret costs partially outlined above, it appears that the Miller campaign has raised some funds to support this campaign. Unfortunately, this campaign has **failed to file ANY C3 contribution reports during this campaign**. Please note this critical information was withheld

from the public during the crucial 60 day window before the contested primary election in which she was able to retain a top-two position. It was impossible for anyone to uncover who or what organizations were funding the Miller campaign during this primary election.

3) Failure to file timely C1 report (violation of RCW 42.17A.205)

The Miller campaign, like all political campaigns is required to file a C1 report within two weeks of announcing her campaign or filing for office, whichever is earlier. However, the Miller campaign delayed filing a C1 report until July 17, 2018, which was substantially late. Please note this critical information was withheld from the public during the crucial 60 day window before the contested primary election in which she was able to retain a top-two position.

4) Failure to file timely F1 report (violation of RCW 42.17A.700)

The Miller campaign was required to file a Financial Affairs Report, or an F1 form with the PDC. There is no evidence that the Miller campaign did so. This is required to be filed within two weeks of becoming a candidate. The Miller campaign is extremely late providing this information. Once again, please note this critical information was withheld from the public during the crucial 60 day window before the contested primary election in which she was able to retain a top-two position and move into the general election in November.

Please note, the margin of Miller's successful election results (as of this date) is 85 votes. This was a closely contested election and for the Miller campaign to effectively run a stealth campaign for a significant county commissioner seat with executive, legislative and quasi-judicial powers with almost zero information provided to the public is very concerning and should be a concern to all who care about transparency in our election process.

The PDC should investigate the possibility that the respondent committed the above violations in an effort to be malicious or willfully hide the truth from the public in an effort to stealthily get through the primary election this week without the public knowing anything about this candidate or her campaign, 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

What impact does the alleged violation(s) have on the public?

The public has a right to know how candidates are spending their campaign funds and who is funding their campaign. In this case, exactly zero information is being provided for the public to know how this candidate is spending their campaign money, who is funding this campaign, and any information about this candidate. This was a stealth campaign shrouded in secrecy, successfully managed through a closely contested primary race. It is not common for a candidate running for such a significant position in county government to successfully ignore nearly all the campaign finance reporting requirements.

List of attached evidence or contact information where evidence may be found.

The candidate's very late C1 is a good place to start - everything else has been hidden from the public

List of potential witnesses with contact information to reach them.

The candidate and her listed treasurer is worth contacting. Most of the necessary information could be obtained first by contacting the candidate, but a secret stealth political campaign like this can be tough to unravel.

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.