

## Complaint Description

### File a Formal Complaint - Glen Morgan

[Glen Morgan](#) (Thu, 23 Aug at 1:27 AM)

To Whom it May Concern –

It has come to my attention that Timm Ormsby, an incumbent legislator from the 3rd Legislative District has continued to commit violations of **RCW 42.17A**. This recent violation occurs despite the current ongoing investigation of Ormsby's historic campaign finance violations currently under investigation by the Public Disclosure Commission (see **PDC Investigation #28127** – filed on November 29, 2017)

#### **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, Tim Ormsby has failed on numerous occasions to do this in the past, and this behavior continues at this time.

Specifically, Mr. Ormsby is required to report all in-kind contributions made to his political campaign. (See **WAC 390-16-2017**).

However, it appears that Ormsby is failing to report in-kind contributions from Pacifica Law Group on his behalf as reported by the Harry Truman Fund (see **PDC Report#100849187**). According to this report, the Pacifica Law Group reported at least \$370.50 of "(in-kind payment to Marcus Riccelli and Timm Ormsby campaigns) legal advice June" dated 7/19/18 and another \$342.00 identified similarly as in-kind contributions to the Timm Ormsby campaign.

Neither of these in-kind contributions were reported by the Ormsby campaign.

There is no excuse for this campaign to not accurately report these in-kind contributions from this vendor. Ormsby has paid Pacifica Law Group in the past (see **PDC Report # 100811151** – last item – also **PDC Report # 100820142** – and finally see **PDC Report # 100848640**). In these two historic C4 reports, the Ormsby campaign has reported paying Pacifica Law Group a total of \$1,539. Additionally, Ormsby has reported in-kind contributions from Pacifica Law Group in the past (see **PDC Report#100848640** - \$114.00 - please note the vendor was incorrectly identified in this line item on the report). These historic reports indicate that Ormsby and his treasurer have experience with this vendor, experience reporting expenditures to this vendor, and experience reporting in-kind contributions for this vendor.

Despite this experience, and even though Ormsby is currently under investigation by the PDC for historic campaign finance violations (See **PDC Investigation #25124**), he clearly believes that the campaign finance laws are mere suggestions unlikely to be enforced for him or his campaign. This recent violation committed by the Ormsby campaign should call into question how seriously the Ormsby campaign takes the campaign finance laws.

It seems likely that other in-kind contributions from this same vendor may be found upon further investigation and interviewing of all the involved parties. If you have any further questions about this complaint, the historic violations of this campaign, or this most recent violation of the state's campaign finance laws, feel free to contact me.

Best Regards,

Glen Morgan

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

The public needs to know if our elected officials are in legal trouble and the fact that law firms are providing legal advice to those same elected officials. The public should know if law firms are providing legal advice as in-kind contributions, particularly when other PACs are reporting these in-kind contributions, but the very campaign for which this legal advice was provided is failing to disclose these facts

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

The complaint description provides adequate reference and relevant data for the complaint to be verified. Billing data and timesheets from the attorneys at the Pacifica Law Group would be evidence the PDC could request to clarify how much in-kind contributions have been concealed by this campaign.

### List of potential witnesses with contact information to reach them.

The Truman Fund PAC treasurer and manager should be contacted  
The Pacifica Law Group should be contacted to verify how much legal expenditures were actually provided as "in-kind" contributions. While exact legal advice is protected information, the bills law firms provide for their services are not - and the value of these services are not protected. The public has a right to know.

### 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.