

Complaint Description

File a Formal Complaint - Glen Morgan

Glen Morgan (Mon, 29 Oct 2018 at 4:24 PM)

To Whom it May Concern --

It has come to my attention that the Win with Women PAC (hereafter collectively referred to as "respondent") 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 C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

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**). State law also requires that contributions must be deposited within 5 business days of receipt. Unfortunately, the respondent has failed on numerous occasions to do this, including, but not limited to the late reports detailed in the attached exhibit. Additionally, the respondent has failed to report debt and properly break down/detail expenditures.

(Please See **Exhibit A: "Illegally late reported C3 & C4 reports"**)

Please note, this secretive PAC's extremely late filings are a total of at least 1,441 days late and involve large sums of hidden cash which was kept from the public during the critical 30 day window through a variety of elections over the past few years. This denied the public or the media any access to the truth about the funding or spending for this well-funded, very sophisticated big-dollar PAC

The PDC should investigate the 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.

Please note the attached exhibit is provided in two different file formats for staff convenience.

Best Regards,

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

Late reporting of contributions and expenditures denies the public's right to know who is funding political campaigns and how that money is being spent. The public and the media have a right to know.

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

Spreadsheets attached and provided in multiple file formats for staff convenience. Please note that PDC tracking numbers for each report are provided as well.

List of potential witnesses with contact information to reach them.

The officers and treasurer are logical first contacts

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.