

Subject: File a Formal Complaint - Glen Morgan

Description:

To whom it may concern,

It has come to my attention that One Washington Equality Campaign PAC has committed significant and serious violations of Washington States Campaign Finance laws (**RCW 42.17A**). These violations continue despite the fact this PAC is under investigation by the PDC. The Specific additional violation is identified as follows:

1. Failure to report in-kind contributions made in support or opposition to a ballot proposition (Violation of RCW 42.17A.240 (6))

Specifically, One Washington Equality Campaign PAC has failed to report significant legal services provided to the PAC by the SEIU Initiative Fund (See **PDC Report # 100917404**) of \$5,634 provided to the One Washington Equality Campaign PAC on 7/8/2019 during their promotion of I-1000 and their opposition to R-88.

This is further evidence that this PAC and the officers involved with this PAC have a pattern of concealing contributions to their PAC, and the only way the public can discover these concealed contributions is when they are hopefully reported by others, like the SEIU Initiative Fund, who actually did report the contributions. However, this would be impossible for citizens to uncover when looking at the documents filed by One Washington Equality Campaign PAC. It is still unknown how many additional "off-the-books" contributions have been made to this PAC, either in cash or in-kind and which still remain unreported. When this is viewed in light of the fact **this committee was forced to reveal over \$228,000 of previously concealed in-kind legal services from Foster Pepper Llc after I filed a complaint exposing this failure**, it seems almost certain that this PAC has additional contributions and expenditures which they continue to conceal from the public.

I will reiterate the same concerns I have expressed before to the PDC about this PAC.

This PAC has highlighted an unusual campaign finance loophole which I've mentioned on a few occasions over the past few years in regards to the use of unpaid debt to hide (or delay the identity) of campaign donors). There is exceptional debt incurred by this campaign which has, as of this complaint, not yet been paid (**over \$1.3 million**). It seems likely that, unless these vendors forgive this debt (and therefore the debt becomes in-kind contributions), the payment of this debt in the future by an as-yet unidentified contributor to this PAC is a significant and effective method for campaigns to obscure and hide multi-million dollar campaign contributions from the public until the revelation of these shadow contributors are revealed long after the political initiative campaign itself is over and the public knowledge can no longer make an impact on the political initiative or referendum being sponsored. Keep in mind, considering this PACs open unwillingness to comply with the campaign finance laws until forced to do so by complaints like this raised by citizens, it sets a terrible future precedent that other bad-actors will certainly follow.

Regardless, this political action committee has clearly violated the law and the PDC should take steps to ensure the law is followed in this matter.

Please feel free to contact me if you need further information.

Best Regards,

Glen Morgan