

Complaint Description

Glen Morgan (Wed, 17 Jul 2019 at 10:05 AM)

To whom it may concern,

It has come to my attention that Citizens for Sequim Schools Bond 4 PAC during the 2016 campaign session has violated Washington State's campaign finance laws (**RCW 42.17A**).

1) Accepting Illegal Over limit Anonymous Contributions (Violation of RCW 42.17A.220 (4))

This PAC violated Washington State's campaign finance laws by accepting more than \$300 in anonymous contributions from donors. Specifically, it appears that they accepted \$3,750 in anonymous contributions (apparently from one source), which is \$3,450 more than the allowable anonymous contribution limit defined in **RCW 42.17A.220 (4)**.

Upon reviewing the expenditures by this candidate's political committee, there is no evidence supporting any claim these funds were eschewed to the Treasury of the State of Washington as is required in law. Therefore this is a violation of the statute, and these funds should be immediately forfeited to the Washington State Treasury.

I have attached the relevant C3 report which provides the limited detail on the anonymous contributions received by this committee during the 2016 campaign. **This committee must forfeit \$3,450 to the Washington State Treasury immediately.** In this way, these funds can be squandered along with the rest of the general fund tax dollars, but at least this forfeiture of anonymous dark money funds may discourage others from attempting to hide their anonymous, secretive, dark money in this political campaign.

This committee should be warned about not taking secretive, dark money anonymously to fund political campaigns. This is a serious violation of Washington's State campaign finance laws and counter to the spirit and intention of transparency in the political process.

2) Failure to timely report contribution to campaign (Violation of RCW 42.17A.235, .220(1))

In addition to accepting an illegal, dark money anonymous contribution far in excess of what the statute allows, this committee also chose to conceal both the contribution and the date of deposit from the public for many months. According to the attached C3 report, this contribution was received (deposited?) on October 30, 2015, but wasn't reported to the PDC until this report was filed on February 12, 2016. This contribution should have been disclosed on November 10, 2015, but instead this committee **chose to conceal it from the public for 90 days** – right before the

special election on this bond was to be held. It should be noted this secret anonymous dark money contribution was the largest contribution to this PAC from any one source.

Please feel free to contact me if you have any further questions on this matter.

Best Regards,

Glen Morgan

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

The public has a right to have local PACs who do not fund their political campaigns by secretive, anonymous dark money funding as this campaign chose to do. This campaign must forfeit these illegal dark money funds and send them to the Washington State Treasury where they can be squandered with the rest of the General Fund. At least it will send a message to future dark money anonymous donors that their money is not welcome, even in campaigns like this one.

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

see attached

List of potential witnesses with contact information to reach them.

All Committee members plus the treasurer

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.

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100678757

02-12-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Citizens for Sequim Schools Bond 4

Mailing Address
 215 Lester WAy

City: Sequim, WA Zip + 4: 98382 Office Sought (candidates): Election Date: 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
10/30/15	a. Anonymous	3,750.00	3,750.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			3,750.00	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

3,750.00

4. Date of Deposit: 10/30/15

Treasurer's Daytime Telephone No.: (360) 301-1816

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: David G Brasher Date: 02-12-2016