### **Complaint Description**

Glen Morgan reported via the portal Tues, 16 July, 2019 at 12:26PM

To whom it may concern,

It has come to my attention that the Lynnwood Forward PAC has committed significant and serious violations of Washington States Campaign Finance laws (**RCW 42.17A**).

### 1) Failure to register as a political committee (Violation of RCW 42.17A.205 & .225)

According to their Facebook page (see attached image), and according to their website (see attached image), this political action committee has been active since at least May 21, 2019, and at this point this committee has not filed a C1PC as either a continuing or single year committee. Based on the description of this PAC both on Facebook and on their website, their sole purpose is to promote a political slate of candidates for the Lynnwood City Council races, and they clearly qualify as the definition of a PAC under **RCW 42.17A.005** (13),(20), (40).

Please keep in mind, while they are actively campaigning and promoting their political candidates for local office, the lack of registration is also denying local voters, the media, and anyone else from auditing their campaign books, identifying their hidden officers, identifying their treasurer, and they are avoiding all transparency associated with all properly registered political action committees. The PDC should verify whether these violations (as blatant as they are) might be committed maliciously (as defined in **RCW 42.17A.005(1)** which would increase the penalties associated with violations of this nature.

## 2) Failure to properly and timely report contributions or expenditures (Violation of RCW 42.17A.235, .240)

In addition, based on the fact that this illegal and unregistered "ghost" PAC has failed to register with the Public Disclosure Commission, this PAC has concealed the source of funding, the identity of the donors to this PAC, and how this PAC has spent the funding it has received. At a minimum this PAC has paid for a website to be produced, for the domain to be reserved (see attached), Hosting at Blue Host (not a free service) (see attached .url lookup information), a Facebook page to be established and managed, and possibly other, secretive expenditures. These expenditures could possibly be hidden behind the three "mini-reporting" candidates which this PAC has been explicitly established to support in their political campaign.

Some clarification may be in order from this PAC as well in regards to how it is structured, which is currently unclear due to the lack of transparency or reporting. However, compliance with **RCW 42.17A.440** should be verified by PDC staff with evidence from this PAC. If this

PAC is not structured to properly comply with this statute, then illegal coordination with an outside PAC is also occurring in this case.

Please feel free to contact me if you have any additional questions.

Best Regards,

### Glen Morgan

Whois Search Results - Lynnwood Forward Domain registry.JPG 102.24 KB

Lynwood Forward Website - Capture 2.JPG 137 47 KB

Lynwood Forward Website - Capture 1.JPG 160.27 KB

FB Capture - 3 - Lynnwood Forward.JPG 94.85 KB

FB Capture - 2 - Lynnwood Forward.JPG 103.12 KB

FB Capture - 1 - Lynnwood Forward.JPG 89.35 KB

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

The public currently can find zero information about this secretive "ghost" PAC on the PDC website. No expenses or contributions have been revealed. The officers of this PAC are secret. The treasurer of this PAC is unknown. The local of where to review the financial books of this PAC is also secret and hidden from the public. Secret "ghost" PACs are illegal, and we are only a few days away from the election. This is a major, egregious violation during the critical window of a highly contested primary campaign.

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

Screen shots of website, Facebook Page, and Whois Domain Registry

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

All three identified "sponsored" or endorsed candidates, their treasurers, and possibly any secretive officers or treasurers as yet unidentified due to lack of disclosure or transparency in this case

### **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.

## WHOIS search results

Domain Name: LYNNWOODFORWARD.COM

Registry Domain ID: 2393654258\_DOMAIN\_COM-VRSN

Registrar WHOIS Server: whois.namecheap.com

Registrar URL: http://www.namecheap.com

Updated Date: 2019-05-22T05:07:13Z

Creation Date: 2019-05-22T05:02:14Z

Registry Expiry Date: 2020-05-22T05:02:14Z

Registrar: NameCheap, Inc.

Registrar IANA ID: 1068

Registrar Abuse Contact Email: abuse@namecheap.com

Registrar Abuse Contact Phone: +1.6613102107

Domain Status: clientTransferProhibited

https://icann.org/epp#clientTransferProhibited

Name Server: NS1.BLUEHOST.COM

Name Server: NS2.BLUEHOST.COM

DNSSEC: unsigned

URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/

>>> Last update of whois database: 2019-07-16T19:15:47Z <<<

# Lynnwood Forward

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& LEARN MORE AT

BALLOTPEDIA.ORG.

20:04:46:27

Days Hours Minutes Seconds

@ REGISTER TODAY AT

SNOHOMISHCOUNTYWA.GOV







# **Lynnwood Forward**

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### Ashkan Amouzegar

City Council Member Position 4

"I want to be a voice for what is coming."

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### Nick Coelho

City Council Member Position 6

"I want to see our small suburb thrive with the changes that are facing us."

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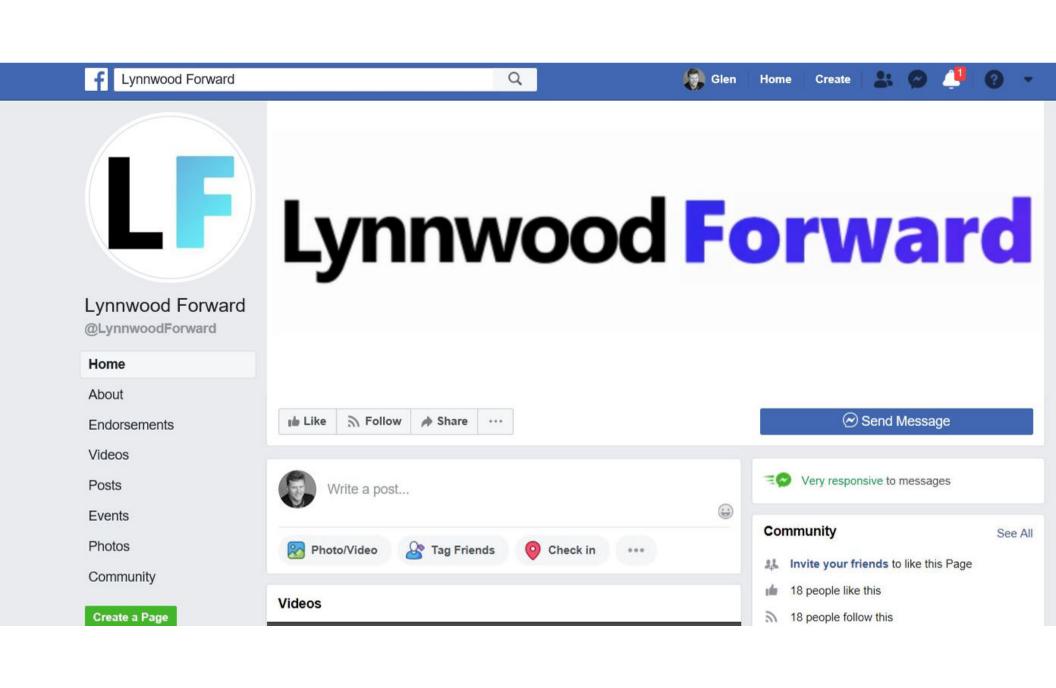


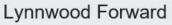
## Naz Lashgari

City Council Member Position 4

"I want to be proactive in managing the growth of Lynnwood."

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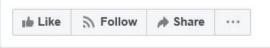
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### Posts



⊗ Send Message

18 people like this

18 people follow this

Mario Lionel Lotmore and 1 other like this



#### About

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RUNNING FOR ELECTION

City Council Member, Position 6
Lynnwood, Washington, Position 6, United
States, Non-Partisan

Election on November 6, 2019



### Page Transparency

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Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

