

Complaint Description

[Glen Morgan](#) (Tue, 27 Aug 2019 at 11:26 AM)

To whom it may concern,

It has come to my attention that Valerie O'Halloran, running for Renton City Council, Position #3 has committed numerous violations of Washington State's campaign finance laws (RCW 42.17A).

1) Failure to accurately describe expense. (Violation of RCW 42.17A.240(6) & WAC 390-16037, RCW 42.17A.235)

O'Halloran's campaign has regularly failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures. Many C4s this campaign has filed contains violations of the statute and the rules written by the Public Disclosure Commission which support the statute.

Here are some examples that need to be corrected by O'Halloran's campaign to at least go through the motions of complying with the statute: Examples of a failure to provide sufficient detail of expenditures (unambiguous violations of **RCW 42.17A.240(6)** and **WAC 390-16-037** (see **example B** provided at **WAC 390-16-037(3)**):

For example, the expenditures reported on **PDC Report #100906341** failed to report how many pieces of signs were printed and purchased from Capital City Press. On the same report, the number of "campaign cards" from Renton Printery were also not detailed These are clear violations of **WAC 390-16-037(3) example B** provided. On **PDC Report #100901478** this campaign failed to provide required details on the purchase of "campaign buttons" from the Buttonsmith. On **PDC Report #100921876**, this campaign failed to report legally required details on the 7/12/19 purchase of "campaign literature" from NWP Consulting. On this same report, this campaign failed to report the legally required details for "campaign handouts" from Amazon, or the number of "campaign stickers" purchased from the Renton Printery.

Most of the C4s which this campaign filed and which mention literature, signs, handouts, or other campaign advertisement materials has failed to provide proper detail as required under the statute. This is a total failure to comply with the statute. This is a well-funded campaign with professional consultants. There is no excuse for a failure to be fully transparent or compliant with the statute.

The PDC should conduct a thorough review of this campaign to identify other violations which may have been committed.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?
The public has a right to know the truth about this campaign and how they spend their resources. This lack of transparency is concerning.
List of attached evidence or contact information where evidence may be found.
A sampling of C4s in violation of the statute have been referenced by PDC Tracking # within the complaint
List of potential witnesses with contact information to reach them.
The candidate, and 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.