

Complaint Description

[Glen Morgan](#) (Thu, 19 Sep 2019 at 2:06 PM)

To whom it may concern,

It has come to my attention that Cynthia D. Johnson running for the Tukwila City Council has frequently failed to comply with Washington State's campaign finance laws (RCW 42.17A). Specifically:

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

Johnson'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 which must be corrected by this 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 #100924452** failed to report any addresses for any vendors. Only their name and "WA" in the description, which is clearly deficient and a failure to follow the statute. Additionally on this same C4 - how many pieces of "walkpiece literature and stickers" were printed and purchased from Overnight Printing. On the same report, the number of "printing for canvassing" from Fedex were also not detailed These are clear violations of **WAC 390-16-037(3) example B** provided.

On **PDC Report #100907230** this campaign has failed to provide most required details on for major vendor "CD Strategic" which appears to be a consultant company.

On **PDC Report #100907228**, this campaign continues to fail to report any information related to address and city for any of the vendors used by this campaign. These are legally required to be reported to the PDC on these C4s. This campaign clearly has the ability to do so because in their Schedule B, attached to this same report, they did provide this detail. However, this campaign chose to not follow the law with the rest of their reporting. In addition, they failed to report legally required details on the 5/22/19 purchase of "signs" from Overnight Printing (another "vendor" with no address reported. This is another example 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)**).

Most of the C4s filed by this committee lack sufficient detail to be compliant with this statute, not just the ones detailed here. This committee will need to go back and correct every filing in order to become compliant with the law.

**2) Failure to provide accurate contact information on Statement of Organization (C1)
(Violation of RCW 42.17A.205 (2) (a))**

In addition, this campaign provides a different address for itself on the C1 report than the address provided on the C3s and C4s. Either the campaign needs to correct the C1 or correct the erroneous addresses listed on each of the C3 and C4s. If all the C3s and C4s are incorrect, it would be a different violation, but it seems most likely that this is a violation of **RCW 42.17A.205(2)(a)**.

Let me know if you need additional information.

Best Regards,
Glen Morgan

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

The public has a right to know how this politician is spending their campaign contributions. The public has a right to know what the legal mailing address for this campaign is and how to contact them.

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

See attached

List of potential witnesses with contact information to reach them.

Candidate, Treasurer, possibly the consultants referenced in the C4s who have no address for their organization.

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.