

## Complaint Description

Glen Morgan (Wed, 23 Oct 2019 at 1:10 PM)

To whom it may concern,

It has come to my attention that the Safer Spokane PAC has violated Washington State's campaign finance laws during the 2017 election cycle (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 \$374 in anonymous contributions, which is \$74 more than the allowable anonymous contribution limit defined in **RCW 42.17A.220 (4)**.

Upon reviewing the expenditures by this PAC'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've attached the final C3 contribution report which details the total anonymous contributions received by this committee during the 2017 calendar year. This PAC must forfeit \$74 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.

Please note, these anonymous contributions trickled into this campaign over time, so they are not part of some kind of rediscovered "low cost fundraiser."

Additionally, this PAC never raised enough funds for the anonymous limit to exceed the potentially higher amount of allowed anonymous contributions of 1%.

This candidate and the campaign 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 accurately describe expense. (Violation of RCW 42.17A.240(6) & WAC 390-16-037, RCW 42.17A.235)**

This PAC'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 this PAC'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 # 100793740** failed to report how many "billboards" were printed and purchased from vendor "Emerald Outdoor advertising", on 10/15/17 for \$2,500. On the same report, two expenditures for "signs" were reported from Vendor "Sun Supply" were made without details provided for how many signs were purchased or assembled. Again on **PDC Report #100787469** this campaign failed to report how many "printing - handouts" were printed from vendor "Papermill" on 3/2/17 for \$138.81. On the same report and undefined number of "signs" were purchased from "Instant Sign" for \$146.75

Another example can be found on **PDC Report # 100797058** this campaign failed to indicate how many "printing flyers" were produced from "Zoo Printing" for \$482.78. This is a clear violations of **WAC 390-16-037(3) example B** provided.

This PAC must be required to refile these and any other C4s in which they failed to comply with the statute. Even PACs like this must follow the law.

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?**

This secretive PAC must forfeit the illegal overlimit anonymous contributions received for this campaign, and they must correctly report how they spend their campaign dollars. They can't conceal this information from the public, and they must comply with the law.

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

c3 attached for reference, and the other C4s are referenced by tracking numbers within the complaint

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

the manager, the treasurer, and any officers who have not gone into hiding

#### **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

100793174

10-16-2017

Candidate or Committee Name (Do not abbreviate. Use full name.)

Safer Spokane

Mailing Address

3205 W 9th Avenue

City

Spokane, WA

Zip + 4

99224

Office Sought (candidates)

Election Date

2017

## 1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
10/15/17	a. Anonymous .....	10.00	374.00
	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
10/15/17	LARRY DEEMER 6008 E 18th Avenue Spokane Valley, WA 99212-3209		<input type="checkbox"/>	<input type="checkbox"/>	50.00	50.00
	Occupation					
10/15/17	CAROLYN HOLMES 2027 W Centennial Way Spokane, WA 99201		<input type="checkbox"/>	<input type="checkbox"/>	50.00	50.00
	Occupation					
10/15/17	JIM MCDONALD 3216 N Maple Street Spokane, WA 99205-2648		<input type="checkbox"/>	<input type="checkbox"/>	50.00	50.00
	Occupation					
			<input type="checkbox"/>	<input type="checkbox"/>		
	Occupation					
			<input type="checkbox"/>	<input type="checkbox"/>		
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			160.00	*See reverse for details.
		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.

160.00

4. Date of Deposit

10/16/17

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

Treasurer's Signature

Date

Michael Bell

10-16-2017

Treasurer's Daytime Telephone No.: (509) 710-3892