

## Complaint Description

Glen Morgan (Sat, 26 Oct 2019 at 12:47 PM)

To whom it may concern,

It is clear and obvious that widespread, egregious violations of Washington State's campaign finance laws (**RCW 42.17A**) are being committed by Keep Washington Rolling PAC right now during this 2019 political campaign season in their multi-million campaign to oppose Initiative 976. Every time I turn around, I find more. Attached is additional supporting evidence...

### **1) Failure to identify top 5 donors (or any donors) on massive campaign mailers (Violation of RCW 42.17A.320)**

Attached is further evidence of these violations. These are all fliers apparently distributed across Washington State and also hosted on their website for downloading. These are different than the two flyer examples I have already submitted to the PDC(See **PDC Enforcement Case #59150**)

It is still unclear from the lack of detail provided by this secretive, well-funded corporate PAC how many mailers have been distributed to voters across Washington State in an effort to influence the outcome of this election. However, as the attached mailer proves and further verifies, **this PAC made zero effort to comply with this transparency requirement No attempt at all. No top 5 donors were identified.** I have attached a photo of at least one of these dark money flyers with photos of the front and back as well as a close up of the lack of donor detail provided.

I will reiterate again, there is no excuse for this type of flagrant and willful violation of the state's campaign finance laws. Clearly, they didn't want the public to know that Microsoft, Amazon, Vulcan, ACEC Washington, and Expedia were the top 5 donors to this campaign. **This campaign has some of the most experienced treasurers and consultants in the state of Washington getting paid big bucks to spend this corporate money influencing the voters. They know full well the state's requirements, and they have made a willful corporate business decision to violate the law and take the minor wrist slap fine which might be imposed on them for breaking the law. Just a minor cost of business in today's campaign finance world where the wealthy and politically connected don't have to follow the law.** It also doesn't hurt that most of these donors have also contributed to the Washington State Attorney General's election campaign in the past and plan to do so in the future. This was also good insurance to make sure Washington State's AG Bob Ferguson won't throw the book at them. A wrist slap fine and some legal pat-a-cake is okay, but nothing serious.

The only way to verify exactly how many millions of mailers this PAC distributed without this basic disclosure statement would be to completely audit the mail houses and media companies hired by this PAC.

I'm sure additional evidence will be trickling in on this case, but that evidence will only serve to support the irrefutable facts alleged in this and previous complaints against this organization.

Best Regards,

Glen Morgan

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

Again, even mega corporate PACs like this one should be required to follow the same laws that are imposed on the rest of us. They should not be allowed to skate with no consequences for blatantly, willfully, and knowingly breaking the law. They knew the law, but they laughed at it to avoid disclosing the truth about who funded their PAC

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

See flyer images attached

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

All officers, treasurer, and printing vendors

**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.



# I-976 Funding Impacts: Chelan/Douglas/Grant/Kittitas

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

## Washington State Funding at Risk

**-\$4 Billion**



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



Freight Mobility Projects



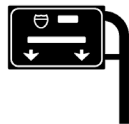
Amtrak Cascades Service

## Regional Projects at Risk

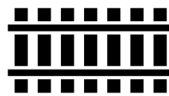
In the last Biennium, Chelan, Douglas, Grant, and Kittitas counties received **over \$12 million** in state mobility grants, as well as **over \$100 million** for rail and highway projects budgeted between 2019-2027. Here are a few of the projects at risk:



**-\$58.2 Million**  
SR 28 Highway East Wenatchee Corridor Improvements



**-\$22.5 Million**  
SR 28/SR 285 North Wenatchee Area Improvements



**-\$14.5 Million**  
Port of Moses Lake Rail Improvements



**-\$6 Million**  
Transit for People with Disabilities, Veterans, and Senior Citizens



**-\$6 Million**  
Transit Service and Operations for Grant Transit Authority, Link Transit, and HopeSource

## Local Funding at Risk

61 cities would lose **\$60 million per year** for local transportation projects over the next 10 years.



**Over \$1 Million Per Year**

Bridgeport, Electric City, Kittitas, Royal City, Soap Lake, East Wenatchee, Wenatchee Transportation Benefit District funding

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.



## I-976 Funding Impacts: Clark County

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk

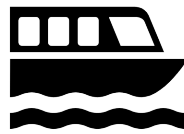
**-\$4 Billion**



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



Freight Mobility Projects



Amtrak Cascades Service

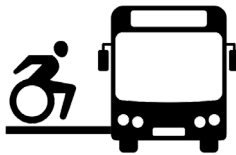
### Regional Projects at Risk



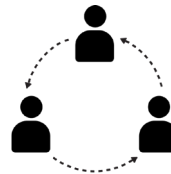
I-5 Bridge Replacement



State Route 14 Widening



Transit for People with Disabilities and Senior Citizens



Fixed-Route Transit Service Between Vancouver, Longview, and Castle Rock



Human Services Council Employment Transportation Program

### Local Funding at Risk

61 cities would **lose \$60 million per year** for local transportation projects over the next 10 years.



**Over \$5.2 Million Per Year**

Vancouver, Battle Ground, Ridgefield, and Washougal Transportation Benefit District funding

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.



## I-976 Funding Impacts: East King County

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk -\$4 Billion



Highway Safety  
Improvements



Washington State  
Patrol



Ferry  
Improvements



Freight Mobility  
Projects



Amtrak Cascades  
Service

### Regional Projects at Risk

I-976 would cut **\$20 billion** of voter-approved funding for Sound Transit, delaying Eastside light rail and bus rapid transit expansion. I-976 would cut **\$119 million** of King County Metro services (2020-2025), including **\$15 million** of vanpool improvements.



Sound Transit  
Eastside Light Rail  
and Bus Expansions



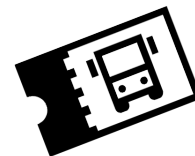
Vanpool  
Improvements



I-405  
Highway  
Widening



State Route 520  
West End Project



14,000 Bus Passes for  
Low Income Families



Transit for  
People with  
Disabilities and  
Senior Citizens

### Local Funding at Risk

61 cities would **lose \$60 million per year** for local transportation projects over the next 10 years.

**-\$376,000/Year**  
**Mercer Island**  
Transportation  
Benefit District

**-\$350,000/Year**  
**Kenmore**  
Transportation  
Benefit District

**-\$200,000/Year**  
**Snoqualmie**  
Transportation  
Benefit District

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.



## I-976 Funding Impacts: King County

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk -\$4 Billion



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



Freight Mobility Projects



Amtrak Cascades Service

### Regional Projects at Risk

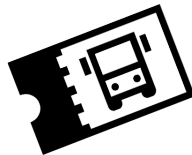
I-976 would cut **\$20 billion** of voter-approved funding for Sound Transit, delaying light rail and bus rapid transit expansion. I-976 would cut **\$119 million** of King County Metro services (2020-2025), including **\$15 million** of vanpool improvements.



Sound Transit Link Light Rail, Bus, and Sounder Expansions



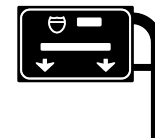
300,000 Hours of Bus Service



14,000 Bus Passes for Low Income Families



I-405 Highway Widening



SR 167/SR 509 Highway Expansion



State Route 520 West End Project

### Local Funding at Risk

61 cities would lose an average of **\$60 million per year** for local transportation projects over the next 10 years.

**-\$36 Million/Year**  
**Seattle**  
Transportation Benefit District

**-\$919,000/Year**  
**Des Moines**  
Transportation Benefit District

**-\$834,000/Year**  
**Shoreline**  
Transportation Benefit District

**-\$767,000/Year**  
**Burien**  
Transportation Benefit District

**-\$376,000/Year**  
**Mercer Island**  
Transportation Benefit District

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.



# I-976 Funding Impacts: Kitsap/Thurston/Mason

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

## Washington State Funding at Risk -\$4 Billion



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



Freight Mobility Projects



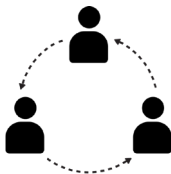
Amtrak Cascades Service

## Regional Projects at Risk

I-976 would cut **\$1.3 billion** in ferry vessel improvements between now and 2031, and eliminate additional funding options for passenger-only ferry districts. I-976 puts **\$188 million** at risk for a new state ferry and **\$48 million** at risk for upgrades to the Bremerton ferry terminal.



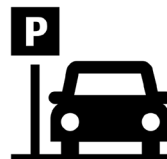
Ferry Service and Upgrades



Regional Transit Connections Between Mason, Kitsap, and Thurston Counties



Bus Rapid Transit Expansion



Park and Ride Expansion



Vanpool Services



Transit for People with Disabilities and Senior Citizens

## Local Funding at Risk

61 cities would lose an average of **\$60 million per year** for local transportation projects over the next 10 years.

**-\$1.7 Million/Year**  
**Olympia**  
Transportation  
Benefit District

**-\$568,500/Year**  
**Bremerton**  
Transportation  
Benefit District

**-\$431,000/Year**  
**Bainbridge Island**  
Transportation  
Benefit District

**-\$224,000/Year**  
**Port Orchard**  
Transportation  
Benefit District

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.



## I-976 Funding Impacts: Transit Access

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk

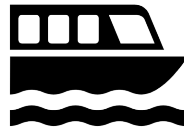
**-\$4 Billion**



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



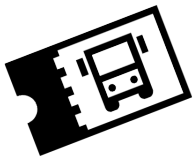
Freight Mobility Projects



Amtrak Cascades Service

### Transit Access Projects at Risk

I-976 hurts vulnerable populations across the state, cutting funding for transit access and affordability services for people with disabilities, veterans, children, senior citizens, and low-income riders. 30 transit agencies across the state are at risk of losing **\$240 million** of funding over 10 years in Formula Grants for special needs transportation projects. Additional cuts include **\$12.2 million** over the next 5 years for King County Metro's Access paratransit program and **\$20 billion** of voter-approved funding for Sound Transit, delaying light rail, commuter rail, and bus rapid transit expansion.



Bus Passes for Low Income Families



Transit for People with Disabilities and Senior Citizens



Employment Transportation Programs



Dial-a-Ride Transit Services



Tribal Transit Operations



Disaster Relief Transit Service

### Local Funding at Risk

61 cities would lose an average of **\$60 million per year** for local transportation projects over the next 10 years.



Local funding for street and traffic maintenance that make our transportation infrastructure work for all, such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.





## I-976 Funding Impacts: Pierce County

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk -\$4 Billion



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



Freight Mobility Projects



Amtrak Cascades Service

### Regional Projects at Risk

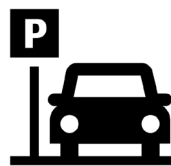
I-976 would cut **\$20 billion** of voter-approved funding for Sound Transit, delaying light rail and bus rapid transit expansion. I-976 would cut Pierce Transit services, such as expansion of transit centers, vanpool, and Park and Ride facilities.



Sound Transit Link Light Rail, Bus, and Sounder Expansions



Pierce Transit Bus Rapid Transit Expansion



Park and Ride Expansion



Completion of SR 167



Transit for People with Disabilities and Senior Citizens



Pierce Transit Vanpool Service

### Local Funding at Risk

61 cities would lose an average of **\$60 million per year** for local transportation projects over the next 10 years.

**-\$3 Million/Year**  
**Tacoma**  
Transportation Benefit District

**-\$822,000/Year**  
**Lakewood**  
Transportation Benefit District

**-\$480,000/Year**  
**University Place**  
Transportation Benefit District

**-\$197,000/Year**  
**Edgewood**  
Transportation Benefit District

**-\$161,000/Year**  
**Fife**  
Transportation Benefit District

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.



## I-976 Funding Impacts: Snohomish County

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk

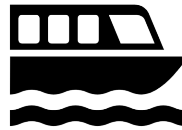
**-\$4 Billion**



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



Freight Mobility Projects



Amtrak Cascades Service

### Regional Projects at Risk

I-976 would cut **\$20 billion** of voter-approved funding for Sound Transit, delaying or eliminating expansions of light rail, bus, and rail service. In the last Biennium, Snohomish County received **\$16.6 million** in state grants. This funding is at risk, and is used for projects such as:



**-\$20 Billion**

Sound Transit Link Light Rail, Bus, and Sounder Expansions



**-\$5 Million**

Community Transit Bus Rapid Transit Green Line



**-\$1.9 Million**

Transit for People with Disabilities, Sauk-Suiattle Tribe, and Senior Citizens



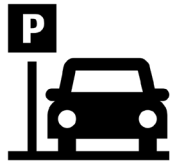
**-\$1.7 Million**

State Route 525 Pedestrian and Traffic Improvements



**-\$1.5 Million**

Community Transit Vanpool Service



**-\$500,000**

Park and Ride Expansion in Everett

### Local Funding at Risk

61 cities would **lose \$60 million per year** for local transportation projects over the next 10 years.

**-\$2.3 Million/Year**

**Everett**

Transportation Benefit District

**-\$1.2 Million/Year**

**Lynnwood**

Transportation Benefit District

**-\$700,000/Year**

**Edmonds**

Transportation Benefit District

**-\$350,000/Year**

**Mountlake Terrace**

Transportation Benefit District

**-\$60,000/Year**

**Granite Falls**

Transportation Benefit District

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as ADA ramp work and sidewalk repairs.



## I-976 Funding Impacts: Spokane County

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk

**-\$4 Billion**



Highway Safety Improvements



Washington State Patrol



Freight Mobility Projects



Amtrak Cascades Service

### Regional Projects at Risk

In the last Biennium, Spokane County received **over \$11 million** in state mobility grants that fund transportation, such as transit services for people with disabilities, senior citizens, the Spokane Tribe, and low-income riders. Spokane County will also receive **over \$850 million** for highway projects between 2019-2029. I-976 would put these projects at risk, including:



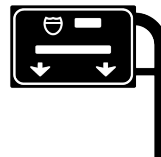
**-\$811 Million**

North/South Freeway Project in Spokane



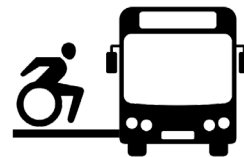
**-\$23.6 Million**

I-90/Barker to Harvard Interchanges



**-\$18.5 Million**

I-90/Medical Lake and Geiger Interchanges



Transit for People with Disabilities, Veterans, and Senior Citizens



Regional Bus Service

### Local Funding at Risk

61 cities would **lose \$60 million per year** for local transportation projects over the next 10 years.



**-\$2.5 Million Per Year**

Spokane Transportation Benefit District funding

Local funding for street maintenance such as pavement repairs, crack sealing, lane striping, chip seal projects, and pedestrian improvements such as ADA ramp work and sidewalk repairs.



## I-976 Funding Impacts: Whatcom/Skagit/Island/San Juan

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk

**-\$4 Billion**



Highway Safety  
Improvements



Washington State  
Patrol



Ferry  
Improvements



Freight Mobility  
Projects



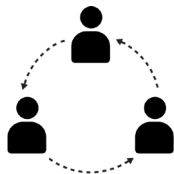
Amtrak Cascades  
Service

### Regional Projects at Risk

I-976 would cut **\$1.3 billion** in ferry vessel improvements between now and 2031, putting at risk **\$188 million** for a new state ferry, **\$19 million** for the Lopez ferry terminal, **\$21 million** for the Orcas ferry terminal, **\$10 million** for the Friday Harbor terminal, and **\$20 million** for the Keystone terminal.



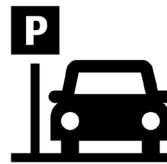
Ferry Service  
and Upgrades



County Connector  
Transit Between  
Whatcom, Skagit, and  
Island Counties



Lummi Transit  
Operations



Park and Ride  
Expansion



Vanpool Services



Transit for  
People with  
Disabilities and  
Senior Citizens

### Local Funding at Risk

61 cities would lose an average of **\$60 million per year** for local transportation projects over the next 10 years.



### Transportation Benefit Districts in Whatcom, Skagit, and Island Counties

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.



## I-976 Funding Impacts: Yakima/Tri-Cities

Initiative 976 repeals critical transportation funding, eliminating our ability to fix dangerous highways, retrofit bridges and overpasses, fund transit, build voter-approved projects, improve freight corridors, and invest in the Washington State Patrol.

### Washington State Funding at Risk

**-\$4 Billion**



Highway Safety Improvements



Washington State Patrol



Ferry Improvements



Freight Mobility Projects



Amtrak Cascades Service

### Regional Projects at Risk

In the last Biennium, Yakima, Benton, Franklin, and Walla Walla counties received **over \$15 million** in state mobility grants, as well as **over \$200 million** for highway projects budgeted between 2019-2027. Here are a few of the projects at risk:



**-\$135 Million**

US 12 Highway Walla Walla Corridor Improvements



**-\$64.4 Million**

I-82 Highway Yakima-Union Gap Economic Development Improvements



**-\$26.8 Million**

I-82 Highway Red Mountain Interchange



**-\$6 Million**

Transit for People with Disabilities and Senior Citizens



**-\$6 Million**

Pasco and Duportail Transit Center and Park and Rides



**-\$2.5 Million**

Ben Franklin Transit Vanpool Improvements

### Local Funding at Risk

61 cities would lose **\$60 million per year** for local transportation projects over the next 10 years.



**Over \$1.1 Million Per Year**

Grandview, Mabton, Toppenish, Wapato, Yakima, Zillah, Richland, and Prosser Transportation Benefit District funding

Local funding for street and traffic maintenance such as pavement repairs, crack sealing, lane striping, street lighting, signals, and pedestrian improvements such as crosswalks, ADA ramp work, and sidewalk repairs.