

Complaint Description

Glen Morgan (Sat, 26 Oct 2019 at 2:44 PM)

To whom it may concern,

It has come to my attention that Megan Dunn, a candidate for the Snohomish County Council has violated the Washington State Campaign Finance laws (**RCW 42.17A**). The details of these violations are as follows:

1) Attempt to conceal campaign donations (Violation of RCW 42.17A.235, .240)

It appears that this campaign has concealed a \$500 donation from the UFCW 21 PAC (See C-4 report **PDC Tracking# 100938503** from UFCW 21 PAC). I have also attached this for reference. **This PAC reports they donated \$500 on 10/7/2019 to the Megan Dunn political campaign. However, this candidate has refused to report this PAC cash on any of the C3s filed since that date.** It should be noted for the record that the UFCW 21 PAC issued many donations on the same day and it appears that nearly all the other candidates and special interest PACs who received this cash have already reported it. This political campaign, however, chose to conceal this information from the public. If it can be determined that this was done willfully, then this candidate could be charged under **RCW 42.17A.750(2)(a)**.

2) Failure to provide adequate details for certain advertising expenditures (Violation of RCW 42.17A.235, .240, WAC 390-16-037).

On at least two occasions, this campaign has also failed to provide adequate details on signs purchased from "Capital Press." See **PDC Tracking # 100938176** on 9/27/19 for \$1,317.60 and **PDC Tracking # 100909743** on 4/23/19 for \$1,372.50. This campaign should be required to correct these illegal reports and correctly report this information to the PDC and for the public.

The PDC should investigate to see if this political campaign, run by experienced and professional consultants and treasurers is violating additional elements of the state's campaign finance laws.

Let me know if you need additional information on this one.

Best Regards,

Glen Morgan

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

The public has a right to know who is funding their local politicians and where that money is coming from. Also, the public has a right to know how these politicians are spending the special interest campaign cash they receive

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

Either referenced by tracking number in complaint and/or attached

List of potential witnesses with contact information to reach them.
the candidate and her professional handlers
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.

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
100938503

10-15-2019

Candidate or Committee Name (Do not abbreviate. Include full name) UFCW 21 PAC			
Mailing Address 5030 1ST AVE S SUITE 200		City SEATTLE, WA	
Zip + 4 98134	Office Sought (Candidates)	Election Date 2019	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?
Report Period Covered From (last C-4) 09/01/19 To (end of period) 10/14/19		Final Report? Yes No X	

RECEIPTS

*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$ \$142,813.25
2. Cash received (From line 2, Schedule A)	\$ \$90,000.00
3. In kind contributions received (From line 1, Schedule B)	\$2,697.33
4. Total cash and in kind contributions received this period (Line 2 plus 3)	\$92,697.33
5. Loan principal repayments made (From line 2, Schedule L)	\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-) \$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-) \$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)	\$235,510.58
9. Total pledge payments due (From line 2, Schedule B)	\$0.00

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)	\$87,003.58
11. Total cash expenditures (From line 4, Schedule A)	\$140,000.00
12. In kind expenditures (goods & services) (From line 1, Schedule B)	\$2,697.33
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)	\$142,697.33
14. Loan principal repayments made (From line 2, Schedule L)	\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-) \$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-) \$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)	\$229,700.91

CANDIDATES ONLY	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:
(206) 486-0085

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$5,809.67
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$1,000.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$4,809.67

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		JASON BENNETT	10/15/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

09/01/19 10/14/19

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/07/2019	\$90,000.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$90,000.00**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
09/05/19	FRIENDS OF BOB FERGUSON PO Box 22169 Seattle, WA 98122		donation to Attorney General race	\$1,000.00
09/05/19	FRIENDS OF LAURIE JINKINS PO Box 2032 Tacoma, WA 98401		contribution to State Rep, 27th LD	\$250.00
09/11/19	CIVIC ALLIANCE FOR A PO Box 9100 Seattle, WA 98109		donation	\$35,000.00
09/23/19	PEOPLE FOR TAMMY MORALES PO Box 20655 Seattle, WA 98102		donation; Seattle City Council District 2	\$250.00
09/23/19	LIZ LOVELETT FOR STATE SENATE 104 W Magnolia Street #2433 Bellingham, WA 98225		donation to State Senate 40th LD	\$1,000.00
09/23/19	DISTRICT ONE FOR LISA HERBOLD 2518 S Brandon Court Seattle, WA 98108		contribution to Seattle City Council, District 1	\$250.00

Total from attached pages \$ **\$102,250.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$140,000.00**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

09/01/19

10/14/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
09/23/19	PEOPLE TO ELECT BEEAN BEGGS PO Box 4452 Spokane, WA 99220		donation; Spokane City Council	\$1,000.00
09/23/19	PEOPLE TO ELECT BEN STUCKART PO Box 40041 Spokane, WA 99220		donation; Spokane Mayor	\$1,000.00
09/23/19	FRIENDS OF JESSICA BATEMEN 120 State Ave NE #1462 Olympia, WA 98501		donation; Olympia City Council	\$500.00
09/23/19	ELECT SOFIA FOR BURIEN 609 SW 150 Street #48004 Burien, WA 98146		contribution; Burien City Council	\$500.00
09/23/19	SCHILLING FOR BURIEN PO Box 411 Burien, WA 98062		donation; Burien City Council	\$1,000.00
09/23/19	AWALE FOR KENT PO Box 5698 Kent, WA 98030		donation; Kent City Council	\$500.00
09/23/19	FRIENDS OF RITUJA 5480 Klahnie Drive SE #232 Sammamish, WA 98029		donation; Sammamish City Council	\$500.00
09/23/19	CITIZENS FOR A BETTER TACOMA PO Box 7183 Tacoma, WA 98417		donation; Tacoma City Council	\$1,000.00
09/23/19	SEATTLE FOR STRAUSS PO Box 2779 Seattle, WA 98165		donation; Seattle City Council Dist 6	\$250.00
09/23/19	PEOPLE FOR STRATTON PO Box 10636 Spokane, WA 99209		donation; Spokane City Council	\$1,000.00
09/23/19	COMMITTEE TO ELECT LESLIE DAUGS 1419 Lindberg Place Bremerton, WA 98310		donation; Bremerton City Council	\$500.00
09/23/19	PEOPLE FOR LORI KINNEAR PO Box 1148 Spokane, WA 99210		donation; Spokane City Council	\$500.00

Page Total \$ \$8,250.00

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 4

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

Report Date

09/01/19

10/14/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/07/19	CIVIC ALLIANCE FOR A PO Box 9100 Seattle, WA 98109		donation	\$40,000.00
10/07/19	WORKING FAMILIES FOR NATHE 3801 N 27th Street, #7437 Tacoma, WA 98407		donation	\$15,000.00
09/24/19	STRONG CENTRALIA SCHOOLS 119 1st Ave S Suite 320 Seattle, WA 98104		donation	\$3,000.00
10/07/19	WA CONSERVATION VOTERS PO Box 1907 Seattle, WA 98111		donation	\$15,000.00
10/07/19	ANDREW LEWIS FOR SEATTLE PO BOX 301 Seattle, WA 98111		donation; Seattle City Council Dist 7	\$250.00
10/07/19	DEBORA FOR DISTRICT 5 PO BOX 22169 Seattle, WA 98122		donation; Seattle City Council District 5	\$250.00
10/07/19	ELECT HIRA 11727 SE 248TH PL Kent, WA 98030		donation; Kent City Council	\$500.00
10/07/19	ELECT JAMILA TAYLOR PO BOX 3996 Federal Way, WA 98063		donation; Federal Way City Council	\$500.00
10/07/19	TAKELE FOR SEATAC P.O.BOX 88164 Tukwila, WA 98138		donation; SeaTac City Council	\$500.00
10/07/19	SENAYET FOR SEATAC PO Box 68927 SeaTac, WA 98168		donation; SeaTac City Council	\$500.00
10/07/19	FRIENDS OF LISA ANDERSON 336 36TH STREET BOX 126 Bellingham, WA 98225		donation; Bellingham City Council	\$500.00
10/07/19	FRIENDS OF NANCY MANOS 100 ANDOVER PARK W, SUITE 150 Tukwila, WA 98188		donation; Tukwila City Council	\$1,000.00

Page Total \$ \$77,000.00

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 5

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

Report Date

09/01/19

10/14/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/07/19	FRIENDS OF JEREMY BARKSDALE 11900 NE 1ST ST #300 Bellevue, WA 98005		donation; Bellevue City Council	\$500.00
10/07/19	ELECT JOSEPH ERIKSON PO Box 2593 Everett, WA 98213		donation; Everett City Council	\$500.00
10/07/19	MILLBAUER FOR KENNEWICK 713 S Young Pl Kennewick, WA 99336		donation; Kennewick City Council	\$500.00
10/07/19	COMMITTEE TO ELECT MEGAN DUNN PO Box 2551 Everett, WA 98213		donation; Snohomish County Council	\$500.00
10/07/19	CITIZENS FOR LIBERTY AND LABOR PO BOX 18845 Spokane, WA 99228		donation	\$15,000.00

Page Total \$ \$17,000.00

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
09/13/19	UFCW 21 5030 1st Ave S Suite 200 Seattle, WA 98134	legal advice (Barnard Iglitzin & Lavitt LLP)	\$1,809.00 \$210,101.68				
09/30/19	UFCW 21 5030 1st Ave S Suite 200 Seattle, WA 98134	staff time	\$811.22 \$210,101.68				
09/30/19	UFCW 21 5030 1st Ave S Suite 200 Seattle, WA 98134	overhead and administration	\$77.11 \$210,101.68				
		TOTAL THIS PAGE	\$2,697.33				

