

## Complaint Description

Glen Morgan reported (Sat, 26 Oct 2019 at 8:51 PM)

To whom it may concern,

It has come to my attention that the Fair and Equal Whatcom PAC committed numerous violations of Washington State's campaign finance laws (RCW 42.17A) during the 2015 election cycle.

1) Failure to accurately describe expense. (Violation of RCW 42.17A.240(6) & WAC 390-16037, 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 # 100665645 failed to report how many "signs" were printed and purchased from vendor "Lisa McShane", on 10/15/2015 for \$2,235.84. On the same report they also failed to legally explain the quantity of "printing/mailing" for \$40,000. This is a clear violations of WAC 390-16-037(3) example B provided. The violations continue. On PDC Report # 100670027, this PAC failed to provide legally required details for a \$17,400 purchase of "mailing" from vendor "Cerillion N4 Partners." Again, on this same report, this PAC failed to provide any details or accurate description associated with a purchase of \$6,996.95 from "Chism Strategies" for "voter contact." What did they do? This is clearly legally deficient. This campaign needs to correct these legally deficient filings and properly report all the details and missing expenditures which have been concealed from the public by this campaigns willingness to ignore the law. This was a well-funded political special interest corporate PAC which had professional support and help. They could have followed the law if they had any interest in doing so.

The PDC should investigate and verify whether this campaign is violating other campaign finance laws as well.

Please feel free to contact me if you need further information.

Best Regards,

Glen Morgan

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

The public has a right to know how well-funded corporate, special interest PACs like this spend their money. These secretive PACs can no longer conceal these expenses and details in the shadows.

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

C4s referenced by tracking number within the body of the complaint

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

All officers of this PAC

**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.