

**Respondent Name**

33<sup>rd</sup> Leg Dist Democratic Party

**Complainant Name**

Glen Morgan

**Complaint Description**

[Glen Morgan](#) (Thu, 6 Aug 2020 at 11:42 PM)

To whom it may concern,

It has come to my attention that the 33<sup>rd</sup> Legislative District Democratic Party has violated Washington State's campaign finance laws (**RCW 42.17A**). The violations are as follows:

**1. Failure to report contribution, concealment of contribution (Violation of RCW 42.17A.235, RCW 42.17A.240, and RCW 42.17A.750(2)(a))**

**The 33<sup>rd</sup> Legislative District Democratic Party appears to have concealed (for nine months now) a major contribution made to their organization.** They have concealed this contribution from the PDC and by extension the public who has a right to know who is funding these organizations. When major contributions are concealed from the public like this, it also leads to serious concerns about how much additional secretive funding is being concealed from the public.

Specifically, according to Representative Mia Gregerson's Surplus Account C4 dated January 10, 2020 (**PDC Tracking #100953894** - see attached), a major contribution of \$500 was sent to the 33<sup>rd</sup> Legislative District Democratic Party on December 1, 2019, yet no report of these funds is revealed in either the 33<sup>rd</sup> LD's reports filed in 2019 or 2020. Nothing. Complete, willful, and total concealment from the public, which is why I'm referencing **RCW 42.17A.750(2)(a)** for consideration in this complaint.

I am aware that Representative Mia Gregerson's campaign finance filings have frequently been riddled with their own set of legal problems and compliance with Washington State's campaign finance laws herself (see **PDC Case #59019 and #59569** as examples). While she hasn't yet been fined by the PDC, that outcome seems inevitable at some point in the future with her track record of violations. Nevertheless, I have no evidence to support the possible scenario that she lied on her C4 report, which I have attached for reference, so I am presuming Rep. Mia Gregerson (in this instance) was reporting this information truthfully.

I suppose only an investigation from the PDC can verify the truth, and it seems essential that copies of this organizations bank records will be necessary in order to verify additional funds are not concealed along the way as a matter of habit.

However, as explained above, this is very concerning and it appears that the 33<sup>rd</sup> LD Democrats put compliance with the state's glorious campaign finance laws at a very low priority. This is a concern.

Feel free to 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 who is funding political organizations like this, even if the organization itself is attempting to conceal the truth. The 33rd LD Democrats should not be allowed to conceal this type of information from the public even if they do want to conceal a contribution from Mia Gregerson.

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

see attached

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

In addition to the officers of the 33rd LD Democrats, Representative Mia Gregerson and her treasurer should also be involved.

**Certification (Complainant)**

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

<b>C4</b> (3/97)	PDC OFFICE USE
	100953894
	01-10-2020

Candidate or Committee Name (Do not abbreviate. Include full name)  
**MIA SU-LING GREGERSON (GREGERSON MIA SU-LING SURPLUS ACCT)**

Mailing Address  
**PO BOX 297**

City  
**SEAHURST,**

Zip + 4 <b>98062</b>	Office Sought (Candidates)	Election Date <b>2018</b>
Report Period Covered <b>12/01/19</b>	From (last C-4) <b>12/01/19</b>	To (end of period) <b>12/31/19</b>
Final Report?		Yes No <b>X</b>

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

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) .....		\$		<b>\$76,324.25</b>
2. Cash received (From line 2, Schedule A) .....		\$	<b>\$0.00</b>	
3. In kind contributions received (From line 1, Schedule B).....			<b>\$0.00</b>	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....				<b>\$0.00</b>
5. Loan principal repayments made (From line 2, Schedule L).....			<b>\$0.00</b>	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)			<b>\$0.00</b>	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)				<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....				<b>\$76,324.25</b>
9. Total pledge payments due (From line 2, Schedule B) .....	<b>\$0.00</b>			

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) .....	<b>\$74,300.00</b>
11. Total cash expenditures (From line 4, Schedule A) .....	<b>\$500.00</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	<b>\$500.00</b>
14. Loan principal repayments made (From line 2, Schedule L).....	<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	<b>\$74,800.00</b>

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.:				

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17) .....	<b>\$1,524.25</b>
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed) .....	<b>\$0.00</b>
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	<b>\$1,524.25</b>

**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 <b>MIA SU-LING GREGERSON</b>	Date <b>01/10/20</b>	Treasurer's Signature	Date <b>01/10/20</b>
---	-------------------------	-----------------------	-------------------------

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE A**  
 to C4  
(11/93)

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

Report Date

**MIA SU-LING GREGERSON (GREGERSON MIA SU-LING SURPLUS ACCT)**

**12/01/19**

**12/31/19**

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

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$           \$0.00

**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.

<b>CODE DEFINITIONS ON NEXT PAGE</b>	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	
12/01/19	33RD DISTRICT DEMOCRATS 17837 1ST AVE S #111 NORMANDY PARK, WA 98148		PARTY SUPPORT	\$500.00

4. TOTAL CASH EXPENDITURES Total from attached pages \$           \$0.00  
Enter also on line 11 of C4 \$           \$500.00