

Respondent Names

49th Legislative District Democrats,

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan

Mon, 26 Feb 2024 at 3:50 PM

To whom it may concern,

It has come to my attention that the 49th Legislative District Democrats, once again, has violation Washington State's campaign finance laws (RCW 42.17A). The details of these violations are as follows:

1) Illegally exceeding contribution limits for mini-reporting. Failing to convert to full reporting political committee. Concealing this information from the public (Violation of RCW 42.17A.205, RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-105, WAC 390-16-115, WAC 390-16-125)

On at least one occasion, this secretive dark money party PAC accepted a contribution far in excess of the contribution limit from one donor to a mini-reporting campaign (See WAC 390-16-105(1)(b)).

Specifically, this campaign received a \$2000 contribution from the Washington State Democrats on 8/23/2023 (See PDC Report # 110172389, attached for staff reference).

There is no evidence of this campaign refunding money to this PAC, nor is there any evidence of this campaign changing filing status from mini-reporting to full reporting (See WAC 390-16-125 for that process). Just to confirm, I have attached the C-1 which was updated a few months before they received this \$2,000 from the Washington State Democrats.

It appears likely that if this secretive PAC was willing to so openly violate the mini-reporting requirements laid out by the Washington State Campaign Finance laws, there are probably more laws they broke as well, but I'll share those details when I have them sorted out.

Please note, this is a crew with a history of violating Washington States campaign finance laws. See PDC Enforcement Case #26544, which I've attached for staff reference. This was based on a solid complaint I filed at the time in 2017, and the same players are involved. I was forced to file a Citizens Action Notice case against them at the time. This time, I hope the PDC considers more stringent penalties this time around.

For now, this should be enough to investigate this crew of lawbreakers.

Let me know if you need anything else.

Best Regards,

Glen Morgan

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

The public has a right to know what secretive dark money groups like this are hiding as they attempt to illegally influence elections. Are they taking money from the Russians? Who knows? They are clearly willing to accept illegal overlimit contributions and not report them to the public.

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

All referenced in the complaint and attached for reference

List of potential witnesses with contact information to reach them

Anyone associated with this PAC, and probably the bank records need to be subpoenaed as well to see what else they are hiding.

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.



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 PO Box 40908 Olympia, WA 98504-0908
 (360) 753-1111
 Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
 AND EXPENDITURES**

C4

Washington State Democratic Committee - NonExempt

Coverage: 07/25/2023 to 08/31/2023

615 2nd Ave Suite 580
 Seattle, WA

Final report: No

Report number: 110172389

Reporting year: 2023

Date submitted: 09/11/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$1,536,038.33
2. Cash received (Schedule A line 1).	\$132,025.00	
3. In-kind contributions received (Line 1 schedule B).	\$21,566.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$153,591.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$1,689,629.33
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$31,911.10
11. Cash expenditures (Line 3 schedule A).	\$46,378.01	
12. In-kind expenditures (Line 1 schedule B).	\$21,566.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$67,944.01
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$99,855.11

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$1,589,774.22
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$1,589,774.22

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

Treasurer's name and date

David Kim - 09/11/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
07/27/2023	\$25.00	08/09/2023	\$30.00	08/24/2023	\$35.00
07/27/2023	\$30.00	08/10/2023	\$5,000.00	08/25/2023	\$100,000.00
08/02/2023	\$20,000.00	08/15/2023	\$20.00	08/28/2023	\$20.00
08/03/2023	\$110.00	08/17/2023	\$20.00	08/28/2023	\$4,000.00
08/03/2023	\$10.00	08/17/2023	\$100.00	08/29/2023	\$25.00
08/07/2023	\$2,500.00	08/23/2023	\$100.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$132,025.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$30.32
08/02/2023	Paragon 3901 Centerview Dr Ste W , Chantilly, VA 20151-3229	G Bank Fees	\$27.50
08/23/2023	10th District Democrats PO Box 1473 , Stanwood, WA 98292-1473	C Contribution	\$2,000.00
08/23/2023	11th District Democrats 17917 162nd Pl SE , Renton, WA 98058-9166	C Contribution	\$500.00
08/23/2023	18th Legislative District Democrats 2125 Seaview St West 2125 Ave W , University Place, WA 98466	C Contribution	\$2,000.00
08/23/2023	19th LD Democrats PO Box 823 , Montesano, WA 98563-0823	C Contribution	\$500.00
08/23/2023	23rd Legislative District Democrats 7245 Cornell Ct Northwest 7245 Ct NW , Bremerton, WA 98311	C Contribution	\$2,000.00
08/23/2023	27th District Democrats PO Box 1532 , Tacoma, WA 98401-1532	C Contribution	\$4,000.00
08/23/2023	31st Legislative District Democrats PO Box 161 , Sumner, WA 98390-0030	C Contribution	\$564.00
08/23/2023	33rd District Democratic Organization PO Box 90608 , Bellevue, WA 98009	C Contribution	\$2,000.00
08/23/2023	39th LD Democratic Party Organization 4405 95th Northeast 4405 - St NE , Marysville, WA 98270	C Contribution	\$2,000.00
08/23/2023	40th LD Democrats 422 N Barker St , Mount Vernon, WA 98273-3118	C Contribution	\$450.00
08/23/2023	49th Legislative District Democrats 7010 NE 56th St , Vancouver, WA 98661-3639	C Contribution	\$2,000.00
08/23/2023	Clallam County Democratic Central Committee PO Box 2454 , Port Angeles, WA 98362-0314	C Contribution	\$2,000.00
			\$46,378.01

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
08/23/2023	Cowlitz County Democratic Central Committee 536 Oregon Way , Longview, WA 98632-1536	C Contribution	\$1,955.00
08/23/2023	Grays Harbor Democratic Committee PO Box 1423 , Aberdeen, WA 98520-0299	C Contribution	\$500.00
08/23/2023	Jefferson County Democrats PO Box 85 , Port Townsend, WA 98368-0085	C Contribution	\$1,300.00
08/23/2023	Kittitas County Democratic Central Committee 1106 E 3rd Ave , Ellensburg, WA 98926-3525	C Contribution	\$1,991.19
08/23/2023	Klickitat County Democratic Central Committee PO Box 154 , Lyle, WA 98635-0004	C Contribution	\$500.00
08/23/2023	Mason County Democratic Central Committee PO Box 1272 , Shelton, WA 98584-0952	C Contribution	\$2,000.00
08/23/2023	NCW Democrats 1 S Chelan Ave Bsmt STE , Wenatchee, WA 98801-2202	C Contribution	\$1,060.00
08/23/2023	Skagit County Democratic Party 1919 Tweed Pl , Anacortes, WA 98221-3132	C Contribution	\$2,000.00
08/23/2023	Snohomish County Democrats 2720 Rucker Ave Ste 101 , Everett, WA 98201-3464	C Contribution	\$2,000.00
08/23/2023	Spokane County Democratic Central Committee 321 S Cedar St , Spokane, WA 99201-7029	C Contribution	\$5,000.00
08/23/2023	Walla Walla Democratic Central Committee PO Box 1323 , Walla Walla, WA 99362-0024	C Contribution	\$2,000.00
08/23/2023	Whatcom County Democrats PO Box 3095 , Bellingham, WA 98227-3095	C Contribution	\$4,000.00
08/23/2023	Yakima Democratic Club 1607 S 1st Ave , Yakima, WA 98902-6005	C Contribution	\$2,000.00

\$46,378.01

4. TOTAL EXPENDITURES:

\$46,378.01

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
08/16/2023	Empowering Resources LLC 24 A Trolley Sq # 1223 , Wilmington, DE 19806-3334		Training Fees	Fair market value: \$3,216.00 Aggregate total (N): \$3,216.00
07/31/2023	Eric Schmidt 1600 Amphitheatre Pkwy , Mountain View, CA 94043- 1351	CEO, Hillspire LLC Mountain View, CA	Stac Labs, Inc - Data Software	Fair market value: \$18,350.00 Aggregate total (N): \$18,350.00

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period

Report notes/attachments

[In Kind Contributions](#)



49th LD Legislative Democrats

7723 NE Fourth Plain Blvd Suite C
Vancouver, WA 98662
andrewgwaran1@gmail.com
3608233038

Registration Filed

Pac
Mini Reporting
Submitted date: 06/15/2023
Certified by andrewgwaran1@gmail.com
Continuing
49THLDN668

Bank Information

iQ Credit Union
7017 NE Vancouver Mall Dr
Vancouver, WA 98661
To schedule books review contact andrewgwaran1@gmail.com

Officers

Andrew Gnanewaran

Treasurer
7723 NE Fourth Plain Blvd Suite C
Vancouver, WA 98662
andrewgwaran1@gmail.com
3608233038

Attachments

Name

Description

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Thu, 12 Oct at 11:56 PM) via Portal Meta To Whom it May Concern --

It has come to my attention that the 49th District Democrats have habitually and willfully committed frequent and multiple violations of RCW 42.17A.

1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, the 49th District Democrats has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

2) Failure to accurately, timely report debt. (Violation of RCW 42.17A.240 (8), see WAC 390-05-295)

State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days be reported on form C4. Per **WAC 390-05-295**, this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service.

The 49th District Democrats illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

**3) Failure to properly break down, describe expenses.
(Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)**

State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with **WAC 390-16-037** and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4.

The 49th District Democrats illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that the 49th District Democrats committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately. Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		1003		As of --		10/12/2017	
Violation #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	WORK VICKI M MS	5/15/2016	\$ 262.24	COPIES	Failure to identify number of items printed, subvendor.	100700485	489
2	LINEHAM THOMAS J MR	5/15/2016	\$ 75.84	COPIES	Failure to identify number of items printed, subvendor.	100700485	489
3	LUX KEVIN	5/15/2016	\$ 250.00	TRAINING	Failure to identify subvendor.	100700485	489
4	ADCO PRINTING & GRAPHICS	10/8/2016	\$ 190.78	REMIT ENVELOPES	Failure to identify number of items printed.	100729158	359
5	WORK VICKI M MS	4/8/2017	\$ 168.02	49TH LD FLYERS	Failure to identify number of items printed, subvendor.	100770515	155
Total			\$ 946.88				

Exhibit B -- Illegal failure to timely report Debt

Cumulative Days Late --				As of -- 10/12/2017			
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late	
							1644
1	TOMMY O'S	10/15/2015	\$ 685.08	FOOD FOR FUNDRAISER	This should have been reported as debt on the 21 day pre-general C4.	730	10/27/2015
2	WORK VICKI M MS	5/15/2016	\$ 262.24	COPIES	This should have been reported as debt on the C4 covering the time period of April 2016	519	6/10/2016
3	CLARK COLLEGE	9/9/2016	\$ 253.00	ARCHER GALLERY	This should have been reported as debt on the post-primary C4.	395	10/18/2016
4	TOMMY OS	10/12/2016	\$ 507.22	CLARK COLLEGE, GALLERY	This should have been reported as debt on the post-primary C4.	395	10/18/2016
Total			\$ 1,707.54				

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 1465

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100695873	C4	N		2/10/2016	5/18/2016	98
2	100736949	C3	N	9/15/2016	9/19/2016	12/8/2016	80
3	100783870	C4	N		6/10/2017	8/28/2017	79
4	100783868	C3	N	6/5/2017	6/12/2017	8/28/2017	77
5	100770514	C4	N		4/10/2017	6/20/2017	71
6	100753044	C3	N	12/28/2016	1/10/2017	3/21/2017	70
7	100695874	C4	N		3/10/2016	5/18/2016	69
8/16/2017							
4:31:19 PM							
8	(Hand filed) C4		N		6/10/2017	8/16/2017	67
42963.688							
0902778							
(Hand							
9	Filed) C3		N	6/5/2017	6/12/2017	8/16/2017	65
10	100737115	C3	N	10/8/2016	10/10/2016	12/9/2016	60
11	100736953	C3	N	10/8/2016	10/10/2016	12/8/2016	59
12	100688170	C3	N	1/20/2016	2/10/2016	4/4/2016	54
13	100736955	C3	N	10/10/2016	10/17/2016	12/8/2016	52
14	100784203	C4	N		7/11/2017	8/30/2017	50
15	100676358	C4	N		12/10/2015	1/28/2016	49
16	100783869	C3	N	7/8/2017	7/10/2017	8/28/2017	49
17	100770515	C4	N		5/10/2017	6/20/2017	41
18	100753045	C4	N		2/10/2017	3/21/2017	39
19	100736957	C3	N	10/30/2016	10/31/2016	12/8/2016	38
20	100695875	C4	N		4/11/2016	5/18/2016	37
42963.688							
0902778							
(Hand							
21	Filed) C3		N	7/8/2017	7/10/2017	8/16/2017	37
22	100784202	C4	N		7/25/2017	8/30/2017	36
23	100752456	C3	N	1/1/2017	2/10/2017	3/12/2017	30
24	100688171	C3	N	2/26/2016	3/10/2016	4/4/2016	25
25	100688172	C3	N	2/13/2016	3/10/2016	4/4/2016	25
26	100789668	C4	N		9/11/2017	10/1/2017	20
27	100676359	C4	N		1/11/2016	1/28/2016	17
28	100714224	C3	N	7/19/2016	7/25/2016	8/4/2016	10
29	100770517	C3	N	5/13/2017	6/10/2017	6/20/2017	10
30	100714219	C4	N		7/26/2016	8/4/2016	9
31	100734938	C4	N		11/1/2016	11/10/2016	9
32	100784200	C3	N	8/15/2017	8/21/2017	8/30/2017	9
33	100695876	C4	N		5/10/2016	5/18/2016	8
34	100708553	C4	N		7/12/2016	7/15/2016	3
35	100729158	C4	N		10/18/2016	10/21/2016	3
36	100675547	C3	Y	12/15/2015	1/11/2016	1/14/2016	3
37	100675548	C3	Y	12/31/2015	1/11/2016	1/14/2016	3
38	100752458	C4	N		3/10/2017	3/12/2017	2
39	100741718	C4	N		1/10/2017	1/12/2017	2