

To Whom it May Concern --

It has come to my attention that the King County Democratic Central Committee, its officers, its treasurer, and its employees (hereafter collectively referred to as "King County Democratic Central Committee" have habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

1) Failure to include certain obligations and expenses in C4 reports filed with the PDC. **(Violation of RCW 42.17A.235 & .240) Please note, this explicitly appears willful and a deliberate attempt to deceive the public on the true financial state of the King County Democratic Central Committee**

As reported in this article: <https://www.thestranger.com/slog/2018/02/24/25852967/former-staffer-accuses-king-county-democrats-chair-of-harassment-and-abuse>

It should be noted that the reporter claims to have been provided documentation from King County Democratic Central Committee meetings that show financial data that directly contradicts the information provided to the PDC. It is illegal to keep two sets of financial books for political committees, and this would only occur if the respondents were doing so in a willful and deliberate manner to deceive.

Please note, it should be stunning that these violations are occurring while this committee is in the middle of a legal action which has been brought against them by the Attorney General and is still in court (Thurston County Superior Court #17-2-02836-34). It should also be noted that part of that lawsuit was originally initiated as a PDC staff complaint, not just a Citizens Action Notice complaint. It is logical that these allegations, once verified, should be included in that legal action.

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, King County Democratic Central Committee has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

2) 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.

King County Democratic Central Committee Committee illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the near certain likelihood that the King County Democratic Central Committee committed the above violations maliciously, willfully, and with a distinct objective to deceive the public 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