

FILED

APR 10 2017

Superior Court
Cristina E. Elnow
Thurston County Clerk

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

17-2-02224-34

STATE OF WASHINGTON,

NO.

Plaintiff,

COMPLAINT FOR CIVIL
PENALTIES AND FOR INJUNCTIVE
RELIEF FOR VIOLATIONS OF
RCW 42.17A

v.

JEFF MORRIS, individually, and
MORRISCAMPAIGN.COM, a
candidate authorized political
committee,

Defendant.

I. NATURE OF ACTION

The State of Washington (State) brings this action to enforce the State's campaign finance disclosure law, RCW 42.17A. The State alleges that Defendant, JEFF MORRIS, and as the candidate authorizing the MORRISCAMPAIGN.COM political committee, violated provisions of RCW 42.17A by failing to timely report contributions received in support of Defendant Morris' 2016 campaign for the state legislature in filings required by law to be made with the State Public Disclosure Commission. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.

II. PARTIES

2.1 Plaintiff is the State of Washington. Acting through the Washington State Public Disclosure Commission, Attorney General, or a local prosecuting attorney, the State enforces the state campaign finance and disclosure laws contained in RCW 42.17A.

COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF FOR
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COPY

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1 2.2 Defendant JEFF MORRIS (Morris) is currently a State representative for the
2 40th Legislative District, and resides in Anacortes, Skagit County, Washington. He also was a
3 2016 candidate for reelection to the 40th Legislative District position and authorized a political
4 committee, MORRISCAMPAIGN.COM as his candidate authorized political committee
5 formed to support his candidacy.

6 **III. JURISDICTION AND VENUE**

7 3.1 This Court has subject matter jurisdiction over the present case, in accordance
8 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to RCW
9 42.17A.765.

10 3.2 This Court has personal jurisdiction over Defendants, a resident of the State of
11 Washington and a Washington state political committee. Additionally, the acts alleged below
12 occurred in whole or in part in Thurston County, Washington.

13 3.3 Venue is proper in this Court pursuant to RCW 4.12.020(1).

14 **IV. FACTUAL ALLEGATIONS**

15 4.1 RCW 42.17A declares as a matter of public policy “[t]hat political campaign
16 and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is
17 to be avoided.” RCW 42.17A.001(1). Further the statute provides that the provisions of the law
18 “shall be liberally construed to promote complete disclosure of all information respecting the
19 financing of political campaigns. . . .”

20 4.2 Washington’s campaign finance law requires a campaign to timely report
21 contributions received. The information required to be disclosed includes the name and address
22 of the source of contributions that exceed \$25 in the aggregate, and the employer and
23 occupation of any individual contributor giving more than \$100 in the aggregate.
24 RCW 42.17A.240; WAC 390-16-037. Contribution disclosures are reported on a Public
25 Disclosure Commission form “C3” which is called the “Cash Receipt Monetary Contributions”

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1 form. Each week's contributions must be reported on the following Monday during the five
2 months prior to a general election. RCW 42.17A.235(3).

3 4.3 Morris officially registered as a candidate for the 2016 general election for the
4 House of Representatives (40th Legislative District) by filing a form C-1 (Candidate
5 Registration) with the Public Disclosure Commission on January 24, 2015. According to the
6 filing, his candidate authorized committee was officially named
7 "MORRISCAMPAIGN.COM."

8 4.4 On or around Monday, August 8, 2016, Defendant Morris filed a C-3
9 contribution report with the Public Disclosure Commission. The form disclosed \$7,550 of
10 contributions received by the campaign during the previous week.

11 4.5 On or about August 22, 2016, Defendant Morris filed an amended version of the
12 C-3 report filed on August 8, 2016. In the amended report, Defendant Morris disclosed an
13 additional \$5,250 of contributions that were received by his campaign on August 2, 2016, and
14 which were required by law to be reported by August 8, 2016. These amounts were reported to
15 the Commission 14 days after the report was due by law.

16 **V. CLAIM**

17 The State re-alleges and incorporates by reference all the factual allegations contained
18 in the preceding paragraphs, and based on those allegations, makes the following claims:

19 4.1 First Claim: The State reasserts the factual allegations made above and further
20 asserts that Defendant, in violation of RCW 42.17A.235(3), failed to timely report
21 contributions received, and in fact filed a 14-day-late form C-3 report on August 22, 2016
22 disclosing \$5,250 worth of contributions that were due to be reported by August 8, 2016.

23 **VI. REQUEST FOR RELIEF**

24 WHEREFORE, the State requests the following relief as provided by law:

25 5.1 For such remedies as the court may deem appropriate under RCW 42.17A.750,
26 including but not limited to imposition of a civil penalty, all to be determined at trial;

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5.2 For all costs of investigation and trial, including reasonable attorneys' fees, as authorized by RCW 42.17A.765(5);

5.3 For temporary and permanent injunctive relief, as authorized by RCW 42.17A.750(1)(h); and

5.4 For such other legal and equitable relief as this Court deems appropriate.

DATED this 7th day of April, 2017.

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