

Respondent Name

April Barker

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#) reported via the portal Fri, 27 Sep 2019 at 12:25AM

To whom it may concern,

It has come to my attention that April Barker, running for Mayor of Bellingham committed numerous violations of Washington State's campaign finance laws (**RCW 42.17A**).

1) Misuse of campaign funds for personal use (Violation of RCW 42.17A.445(2), WAC 390-16-238)

On multiple occasions campaign funds have been improperly used by this candidate for the personal use and benefit of the candidate. In **RCW 42.17A.445 (2)**, the law clearly states that campaign expenditures for the candidate or reimbursements can only be for campaign related expenses:

“Reimbursement for direct out-of-pocket election campaign and postelection campaign related expenses made by the individual.”

Furthermore, **WAC 390-16-238** provides even further more detailed guidance on this campaign finance issue. There are at least two examples as evidence of this violation. This campaign is claiming that Verizon cell phone bill expenditures of \$161.32 should be considered a campaign expense (even if only counted as “in kind” (See **PDC Report # 100920502**) This was also done again a second time on 6/6/19 for a \$240.64 Verizon phone bill (See **PDC Report # 100917645**). These should not be reported on this candidate's campaign documents, as it is something the candidate would purchase on their own regardless of whether they were running a campaign or not. Please note, even if there is some way this candidate is able to justify these common expenses as campaign related expenses, the candidate is failing to provide adequate detail and validation that every bit of the cell phone use (presumably their personal phone) was exclusively used for campaign purposes.

2) Failure to accurately describe expense. (Violation of RCW 42.17A.240(6) & WAC 390-16037, RCW 42.17A.235)

Barker'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 Barker’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 # 100917645** failed to report how many “yard signs” were printed and purchased from Capital City Press, fronted by Blue Spruce Strategies, LLC on 6/05/2019 for \$411.70 and again on 6/28/2019 for \$625.03. Additionally, on the same report, this campaign spent \$1,800.00 on “walk pieces” from Capital City Press through Blue Spruce Strategies on 6/05/19, also failing to adequately describe the quantity or description of whatever was printed. On the same report, this campaign also did “postcard printing” on 6/5/2019 for \$973.23 also with no details for quantity. This is a clear violations of **WAC 390-16-037(3) example B** provided.

This campaign needs to be more transparent about these expenditures, and they need to provide more detail on their C4 reports in light of concerns over potential misuse of campaign funds for personal benefit.

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 the truth and the details about how a politician spends their political funding, and that same politician can't pretend to claim personal expenses as campaign expenditures (or in-kind contributions). The public has a right to have candidates like this follow the law instead of flouting it.

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

All PDC documents are referenced by PDC reference number within the body of the complaint

List of potential witnesses with contact information to reach them

The candidate, the treasurer, and the consultants

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.