



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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December 10, 2019

Delivered electronically to "dous@novonordisk.com"

Subject: Complaint regarding Camas Taxpayers Alliance (No on Camas Pool Bond), operated by Margaret Tweet and Scott Hogg, PDC Case 59299

Dear Douglas Ray Speas:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 17, 2019. Your complaint alleged that Camas Taxpayers Alliance (No on Camas Pool Bond), operated by Margaret Tweet and Scott Hogg, may have violated RCW 42.17A.205 by failing to register as a political committee; and RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures, and by exceeding \$5,000 in expenditures while under the mini-reporting limits. PDC staff added an additional possible violation of RCW 42.17A.220(4) by accepting, depositing, and expending anonymous contributions that were \$1,260.91 in excess of the \$300 limit for anonymous contributions.

PDC staff reviewed your allegations and staff's allegation; the applicable statutes, rules, and reporting requirements; the responses provided by Scott Hogg, which included a complete list of contributions received and expenditures made for the campaign; to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- No to Camas Pool Bond is the URL to a website produced, managed and paid for by Camas Taxpayers Alliance (CTA), whose Treasurer is Scott Hogg. Camas Taxpayers Alliance is a political committee registered with the Public Disclosure Commission (PDC). The committee selected the Mini Reporting Option for the November 5, 2019 election, and stated they opposed the Camas Pool Bond ballot proposition. The committee was limited in total contributions and expenditures to \$5,000, and \$500 in contributions from any one person.
- For the entire campaign, CTA raised \$4,995.91 and spent \$4,969.91, leaving cash on hand of \$26.30. As of October 17, 2019, the date you filed your complaint, expenditures totaled \$4,066.96, \$933.04 under the \$5,000 Mini Reporting limit. CTA was aware of the Mini Reporting limits, and returned two contributions to keep the committee under \$5,000 in contributions received.

- Camas Taxpayers Alliance received contributions from 10 individuals totaling \$2,435, and from two entities totaling \$1,000, and kept detailed records for these contributions. However, they also received anonymous contributions totaling \$1,560.91 over a four-week period from multiple individuals who picked up signs from the porch of the treasurer in exchange for a recommended donation of \$3 per sign. CTA does not know the names of these individuals, and the money has been spent. Mr. Hogg said if he had been aware of the requirement to identify each small contributor, he would have done so. For a campaign that is \$30,000 or less, RCW 42.17A.220(4) requires that anonymous contributions in excess of \$300 not be deposited, used or expended, but be returned to the donor if the donor can be identified, or escheated to the state, which was not done. The over-limit anonymous contributions totaled \$1,260.91.
- Mr. Hogg stated that he kept meticulous books and reviewed the PDC website, but did not see anything about a limit for unidentified or anonymous contributions for a campaign of their size. He said they misunderstood the PDC's online instructions about anonymous contributions, erroneously believing the limit only applied if the committee raised \$30,000. He said the committee did not know it was violating the law, and said its noncompliance was unintentional.
- On October 30, 2019, PDC staff asked CTA to update its website and Facebook page to include the name of the committee and its address, which they did the same day.
- Camas Taxpayers Alliance does not have previous warnings/violations of PDC requirements.

Based on these findings, staff has determined that in this instance, the failure to return the anonymous contributions it received in excess of \$300 to donors or escheat the contributions to the state does not amount to a violation warranting further investigation.

PDC staff is reminding Margaret Tweet, Scott Hogg, and Camas Taxpayers Alliance about the importance of carefully reviewing all applicable statutes, rules, and requirements before engaging in campaign activity.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Phil Stutzman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,
/s _____
Phil Stutzman
Compliance Officer

Endorsed by,
/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Margaret Tweet, Scott Hogg, Camas Taxpayers Alliance