

<b>Respondent Name</b>	Mary "Peggy" Shepard
<b>Complainant Name</b>	David Bryan Holloway
<b>Complaint Description</b>	<p><u>Bryan Holloway</u> reported via the portal Wed, 30 Oct 2019 at 8:47PM</p> <p>On October 10, 2019 at 6:00 PM Council Member Peggy Shepard attended a Council Town Hall Meeting, of the city council of Snoqualmie, wearing a campaign sweatshirt listing out three candidates currently campaigning in the November 2019.</p> <p>Council member Shepard is in full knowledge of RCW 42.17A.555 as demonstrated by her husband's complaint on another matter citing this code (1), her attendance at Snoqualmie F&amp;A meeting discussing the RCW code considerations in regards to a change of Council proceedings to remain in compliance (2) and her participation in Council discussion on those changes (3). The sweatshirt in question was purchased solely for the purposes of campaigning as demonstrated by her Facebook post regarding its purchase (4).</p> <p>At the beginning of the meeting on October 10, 2019 fellow council members and others advised Ms. Shepard that the shirt was in violation of RCW, but she did not remove the shirt or herself from the meeting. At this time council was taking under consideration suspension of proceedings in order to remain compliant with the cited RCW. Latter staff showed on line to Ms. Shepard the cited RCW 42.17A.555 and again advised her on her responsibilities in this regards. After this Ms. Shepard exited from the meeting.</p> <p>Based upon the prior actions and meetings cited, my opinion is that this violation of RCW 42.17A.555 was done with full knowledge and intent. Acting as Mayor Protem for the city of Snoqualmie, I request PDC review and actions as appropriate be taken against Ms. Shepard in regards to this incident.</p> <p>Bryan Holloway.docx 14.47 KB</p> <hr/> <p><u>Bryan Holloway</u> replied Sun, 10 Nov 2019 at 6:55PM to: "PDC Support" <a href="mailto:pdcc@pdcc.wa.gov">pdcc@pdcc.wa.gov</a></p> <p>Image of shirt:</p>



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

Use of Public Office to campaign

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

1) Email; "Is This an Allowed Activity?" From: Dick Scheel (Spouce to Council Member Peggy Shepard; To: Washington Public Disclosure Commission; Dated: June 17, 2019.

2) City of Snoqualmie, Finance and Administration Committee Snoqualmie. August 6, 2019

Minutes: <http://wa-snoqualmie.civicplus.com/DocumentCenter/View/28158/Finance-and-Administration-Council-Committee-Agenda-08-06-2019-PDF>

Audio: <http://wa-snoqualmie.civicplus.com/DocumentCenter/View/28165/20190806-Finance-and-Administration-Council-Committee-Audio>, Time Mark: 1:30:00

3) City of Snoqualmie, Regular council Meeting, September 09, 2019

Minutes: <http://www.ci.snoqualmie.wa.us/DocumentCenter/View/29719/City-Council-Minutes-09-09-2019-PDF>

Video: <https://www.youtube.com/watch?v=E4bdk82UHBI>, Time Mark: 1:45:00

4) Facebook page: City of Snoqualmie Politics;

<https://www.facebook.com/groups/CityofSnoqualmiePolitics/>; Peggy Shepard post September 09. 2019

**List of potential witnesses with contact information to reach them**

Snoqualmie City Attorney: Bob Sterbank, 425-831-1888, [bsterbank@ci.snoqualmie.wa.us](mailto:bsterbank@ci.snoqualmie.wa.us)

Snoqualmie City Clerk: Jodi Warren, 425-888-8016, [jwarren@ci.snoqualmie.wa.us](mailto:jwarren@ci.snoqualmie.wa.us)  
Snoqualmie City council Member: Bob Jeans, [bjeans@ci.snoqualmie.wa.us](mailto:bjeans@ci.snoqualmie.wa.us)

**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.

Bryan Holloway  
c/o City of Snoqualmie  
38624 SE River Street  
PO Box 987  
Snoqualmie, WA 98065  
425-524-5437  
bholloway@ci.snoqualmie.wa.us

October 13, 2019

Washington State Public Disclosure Commission  
711 Capitol Way S. #206  
PO BOX 40908  
Olympia, WA 98504-0908

Subject Violation of RCW 42.17A.555 Pursuant to Use of Public Office for the purposes of supporting a campaign

References:

- 1) Email; "Is This an Allowed Activity?" From: Dick Scheel (Spouce to Council Member Peggy Shepard; To: Washington Public Disclosure Commission; Dated: June 17, 2019.
- 2) City of Snoqualmie, Finance and Administration Committee Snoqualmie. August 6, 2019  
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On October 10, 2019 at 6:00 PM Council Member Peggy Shepard attended a Council Town Hall Meeting, of the city council of Snoqualmie, wearing a campaign sweatshirt listing out three candidates currently campaigning in the November 2019.

Council member Shepard is in full knowledge of RCW 42.17A.555 as demonstrated by her husband's complaint on another matter citing this code (1), her attendance at Snoqualmie F&A meeting discussing the RCW code considerations in regards to a change of Council proceedings to remain in compliance (2)

and her participation in Council discussion on those changes (3). The sweatshirt in question was purchased solely for the purposes of campaigning as demonstrated by her Facebook post regarding its purchase (4).

At the beginning of the meeting on October 10, 2019 fellow council members and others advised Ms. Shepard that the shirt was in violation of RCW, but she did not remove the shirt or herself from the meeting. At this time council was taking under consideration suspension of proceedings in order to remain compliant with the cited RCW. Latter staff showed on line to Ms. Shepard the cited RCW 42.17A.555 and again advised her on her responsibilities in this regards. After this Ms. Shepard exited from the meeting.

Based upon the prior actions and meetings cited, my opinion is that this violation of RCW 42.17A.555 was done with full knowledge and intent. Acting as Mayor Protem for the city of Snoqualmie, I request PDC review and actions as appropriate be taken against Ms. Shepard in regards to this incident.

Sincerely,

D. Bryan Holloway

Council Member, Mayor Protem

City of Snoqualmie Washington.