

Respondent Name
Amanda McDougall
Complainant Name
Glen Morgan
Complaint Description
<p><u>Glen Morgan</u> reported via the portal Wed, 20 Nov 2019 at 11:22AM</p> <p>To whom it may concern,</p> <p>It has come to my attention that Amanda McDougall, who ran for the Centralia School Director position #4 this year has committed numerous violations of Washington State’s campaign finance laws (RCW 42.17A).</p> <p>1) Failure to accurately describe expense. (Violation of RCW 42.17A.240(6) & WAC 390-16037, RCW 42.17A.235)</p> <p>McDougall’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.</p> <p>Here are some examples that need to be corrected by McDougall’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)):</p> <p>For example, the expenditures reported on PDC Report # 100932017 failed to report the number of “yard signs” and stakes when this campaign claims they spent \$1,363.32 with vendor “Twin Cities Sign and Graphic” on 8/29/19. On PDC Report # 100939318 nebulous “doorbell literature” was purchased from vendor “Staples” on 10/09/19. The details of what it is, and the quantity must be reported. These are clear violations of WAC 390-16-037(3) example B provided.</p> <p>Most of the C4s which this campaign filed and which mention literature, signs, handouts, or other campaign advertisement materials has failed to provide proper detail as required under the statute. This is a total failure to comply with the statute. There is no excuse for a failure to be fully transparent or compliant with the statute.</p> <p>2) Failure to file timely C4 and C3 reports (Violation of RCW 42.17A.235, .240)</p> <p>It appears that most C3 and C4 report filed by this campaign were filed late.</p> <p>For example, See PDC report #100939317, which was filed on 10/19/2019, but was reporting on expenditures from 9/25/19. This report was about 4 days late. This delay was willful and made in an effort to conceal the fact that they were collecting large donations from a local union. Please note, this was filed after the 21 day critical window before the election cycle.</p>

Another example, See **PDC Report #100932017**, filed 9/18/2019 and reporting a \$1275 in deposits and expenditures of \$1363. Again, this was filed about 8 days late.

Another example, See **PDC Report #100939318** filed on 10/19/2019. This report was about 4 days late.

Another example, See **PDC Report#100931853** filed on 9/17/2019. This report was 7 days late.

It appears this campaign pretty much filed every report late, and they have failed to comply with timely reporting requirements. While the PDC may not consider reporting dates to be important any longer, it should still be noted that there was no effort by this campaign to comply with any of the reporting dates theoretically required by the PDC (the statute is clear, the PDC just doesn't really enforce these rules any longer). The PDC should conduct a thorough review of this campaign to identify other violations which certainly have been committed.

While these violations are serious and significant, they are not as serious as other violations I have documented and provided to the PDC about other PACs and candidates. However, there is a moral hazard problem created here when candidates like this can just mostly ignore the campaign finance laws, run contested campaigns (and prevail) , and use these late reporting events to conceal (for a time) their major donors. In small, local races like this – this type of active concealment is concerning and needs to be confronted, otherwise why should any candidate even bother complying.

It isn't necessary to do the Tim Eyman - style scorched earth campaign of personal destruction against this candidate. However, they should face some token wrist-slap, penalty for not even trying to comply much at all. Otherwise, of course, it will only be worse next time.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

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

Local candidates for public office like this should not be allowed to conceal the identities of their major donors from the public, even if only for a week or so. This is particularly true during the 21 key days when ballots have been mailed to the voters in the district. They should still be required to follow the law, even if they don't want to comply.

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

All PDC reports are referenced by tracking number within the body of the complaint

List of potential witnesses with contact information to reach them

The candidate seems sufficient

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.