

Respondent Name

Mark Lundsten

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#) (Tue, 21 Jul 2020 at 5:19 PM)

To whom it may concern,

It has come to my attention that Mark Lundsten, a candidate for Skagit County Commissioner has violated Washington State’s campaign finance laws (**RCW 42.17A**). The details of these violations are as follows:

1) Failure to accurately describe expense, and the illegal concealment of required information from the public. (Violation of RCW 42.17A.240(6) & WAC 390-16-037, RCW 421)

This campaign has failed to follow Washington State’s Campaign Finance laws as they apply to the reporting of expenditures.

Here are some examples that need to be corrected by this campaign to at least go through the motions of complying with the statute: On the campaign’s C4 (**PDC Tracking # 100983556** see attached) dated June 6, 2020, the campaign reported two in-kind expenditures on the Schedule B one for \$2,729.53 purportedly for “Signs” from vendor “Capital Press” but failed to legally detail how many signs were purchased, **a clear violation of the law**. On the same report, there was another in-kind contribution to the same vendor for the same nebulous “signs.” **More clear violations of the law**.

These are clear 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)**).

This law applies even if these are in-kind contributions to the campaign. This campaign should be able to at least marginally comply (or at least go through the motions of compliance) with the statute. Every ORCA class put on by the PDC explicitly instructs those who take the class about these requirements. It is possible to comply with the law.

Please let me know if you need any further details on this complaint.

Best Regards,

Glen Morgan

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

A campaign should not be able to conceal from the public, legally required details on how its campaign expends funds. This should include when candidates purchase these items and donate them as "in-kind." The law still applies

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

see attached

List of potential witnesses with contact information to reach them

All members of this campaign

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.

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4 (3/97)	PDC OFFICE USE
	100983556
	07-14-2020

Candidate or Committee Name (Do not abbreviate. Include full name)
MARK LUNDSTEN (Lundsten for Skagit)

Mailing Address
PO Box 574

City
Anacortes, WA

Zip + 4 98221	Office Sought (Candidates) COUNTY COMMISSIONER	Election Date 2020
Report Period Covered From (last C-4) 06/01/20	To (end of period) 07/13/20	Final Report? Yes No X

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$		\$1,488.77
2. Cash received (From line 2, Schedule A)	\$		\$12,708.00
3. In kind contributions received (From line 1, Schedule B).....			\$3,727.99
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			\$16,435.99
5. Loan principal repayments made (From line 2, Schedule L).....			\$0.00
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)			\$0.00
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			\$17,924.76
9. Total pledge payments due (From line 2, Schedule B).....			\$0.00

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)	\$1,393.07
11. Total cash expenditures (From line 4, Schedule A)	\$3,259.41
12. In kind expenditures (goods & services) (From line 1, Schedule B)	\$3,727.99
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	\$6,987.40
14. Loan principal repayments made (From line 2, Schedule L).....	\$0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	\$8,380.47

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:
(206) 682-7328

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$9,544.29
<small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	
19. Liabilities: (Sum of loans and debts owed)	\$5,116.76
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$4,427.53

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature MARK LUNDSTEN	Date 07/14/20	Treasurer's Signature Josie Olsen	Date 07/14/20
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CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4 **A**
(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

MARK LUNDSTEN (Lundsten for Skagit)

06/01/20

07/13/20

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
06/08/2020	\$550.00	06/19/2020	\$1,675.00	06/26/2020	\$1,015.00	
06/12/2020	\$750.00	06/21/2020	\$430.00	06/28/2020	\$150.00	
06/14/2020	\$850.00	06/19/2020	\$250.00	See attached		

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ \$12,708.00

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$329.94
06/22/20	ANEDOT 1340 Poydras St Ste 1770 New Orleans, LA 70112		Credit Card Fees	\$52.50
07/10/20	MAKE NORTHWEST 11307 Whistle Lake Rd Anacortes, WA 98221		Digital Consulting	\$650.00
06/25/20	ROBERT DOLL 1319 8th St Anacortes, WA 98221		Printing Reimbursement-Anacortes Printing (500 remits),	\$116.84
07/09/20	ROBERT DOLL 1319 8th St Anacortes, WA 98221		Reimbursement-Bayshore Office (407 copies) and The Mailbox (postage)	\$444.54
07/08/20	CAPITOL CITY PRESS 2975 37th Ave SW Tumwater, WA 98512		Mailer (9021)	\$1,665.59

Total from attached pages \$ \$0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ \$3,259.41

Attachment to Schedule A
Additional Deposits

for the period: 06/01/20 07/13/20

3

Name

MARK LUNDSTEN (Lundsten for Skagit)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
06/25/20	\$100.00				
07/02/20	\$1,300.00				
07/03/20	\$400.00				
06/30/20	\$500.00				
07/05/20	\$568.00				
06/29/20	\$1,525.00				
07/10/20	\$1,120.00				
07/10/20	\$75.00				
07/09/20	\$1,400.00				
07/12/20	\$50.00				

LOANS

**SCHEDULE
TO C3
OR C4**

L
(12/99)

Candidate or Committee Name

Report Date

MARK LUNDSTEN (Lundsten for Skagit)

06/01/20

07/13/20

1. MONETARY OR IN-KIND LOAN RECEIVED. Loans are considered contributions and are subject to any applicable limit.

Date Loaned	Lender's Name and Address	P R I	G E N	Amount of Loan	Annual Interest Rate	Repayment Schedule	Date Due
06/09/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	X		\$186.80	0%	As funds	
<p style="text-align: center;">In-Kind Loan</p> <p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liable For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer Endorser's Occupation and Name, City, & State of Employer	
06/08/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	X		\$500.00	0%	As funds	
<p style="text-align: center;">In-Kind Loan</p> <p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liable For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer Endorser's Occupation and Name, City, & State of Employer	
06/03/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	X		\$12.97	0%	As funds	06/08/20
<p style="text-align: center;">In-Kind Loan</p> <p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liable For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer Endorser's Occupation and Name, City, & State of Employer	
06/10/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	X		\$38.92	0%	As funds	06/08/20
<p style="text-align: center;">In-Kind Loan</p> <p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liable For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer Endorser's Occupation and Name, City, & State of Employer	

LOANS

**SCHEDULE
TO C4**

L

(12/99)

7

Candidate or Committee Name

Report Date

MARK LUNDSTEN (Lundsten for Skagit)

06/01/20

07/13/20

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount	Principal Repaid or Forgiven	Amount Owed
06/09/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$186.80	\$0.00	\$186.80
06/08/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$500.00	\$0.00	\$500.00
05/13/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$1,241.40	\$0.00	\$1,241.40
05/14/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$74.00	\$0.00	\$74.00
06/03/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$12.97	\$0.00	\$12.97
05/29/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$73.37	\$0.00	\$73.37
06/10/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$38.92	\$0.00	\$38.92
06/18/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$2,729.53	\$0.00	\$2,729.53
06/26/20	MARK LUNDSTEN PO Box 574 Anacortes, WA 98221	\$259.77	\$0.00	\$259.77
			Subtotal This Page	\$5,116.76