



State of Washington
PUBLIC DISCLOSURE COMMISSION

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December XX, 2020

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaints regarding Matthew Little, PDC Cases 79287 and 79713

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 29, 2020, and November 6, 2020, respectively. The complaints alleged that Matthew Little, a first-time 2020 candidate for County Council Member (Position 4) in Clark County, may have violated RCW 42.17A.235 and .240 for failure to accurately disclose Receipts and Expenditure Summary (C-4) reports; RCW 42.17A.445 for personal use of campaign funds; and RCW 42.17A.405 for accepting over limit contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the Matt Little for Clark County Committee (Campaign); and the November 8, 2020 responses to the complaints provided by Paula Little, Treasurer on behalf of the Campaign.

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

- On January 7, 2020, Matthew Little timely filed a Candidate Registration (C-1) report for County Council Member (Position 4) in Clark County and selected the Full Reporting Option.

Alleged failure to file timely contribution (C-3) and expenditure (C-4) reports – (RCW 42.17A.235) and RCW 42.17A.445 for personal use of campaign funds – (RCW42.17A.405).

- Staff reviewed the Summary, Full Report Receipts and Expenditures (C-4) reports attached to the complaint as evidence of possible violations by the Campaign. Staff noted that the description of the payments/expenditures made by the Campaign on the (Months) C-4 reports and found that some of the expenses lacked proper description(s) and breakdowns required by law/rule. For example, the Campaign failed to furnish the final details regarding the ads paid to *Ravena Strategies* in the amount of \$5,000 on October 20, 2020. The Campaign also failed to include the quantity/number of mailers and yard signs paid to ADCO Printing in the amounts of \$10,050.97 and \$1,074, respectively on September 14, 2020. The Campaign also failed to include the details/number of items for the payments made to ADCO printing (for

signage) in the month of October 2020. A more detailed description that includes the number of items bought should have been included in the October 13 and October 27, 2020 C-4 reports by the Campaign.

- On November 8, 2020, the Campaign amended the pertinent three C-4 reports and included detailed description/breakdown of expenditures made and the number/quantity of items bought. In its response to this specific allegation, the Campaign, by way of Paula Little, Treasurer, stated: “We reported that the campaign made a package purchase of digital ads from a consulting company who would then place the ads to fit our time period, location, and target audience. The campaign did not choose ad placement as that was a service provided by the consultant. At the time the invoice was received, the detail information had not been committed. All monies were reported accurately on time and did not materially impact the public interest. The public was not deprived of knowing the value of the purchase, only the final details of the ads. The campaign will amend reports to supply quantities and clearer descriptions of signs, mailers and printed materials.”
- Regarding the alleged violation of RCW 42.17A.445 for personal use of campaign fund for \$259 paid on October 7, 2020, to *Rapid Auto Glass* for glass replacement, staff noted that the expenditure was related to acceptable use of campaign fund. In its response, the Campaign stated: “This expenditure was not for the candidate’s personal vehicle, but for the campaign manager’s personal vehicle. The damage to the windshield happened when carrying 10 foot boards for the purpose of erecting 4’x 8’ campaign signs inside the vehicle. No other vehicle expenses were provided for the campaign manager. The campaign felt responsible for this expense as the lumber was solely for the purpose of the campaign. The details will be included in the amended report.”

Alleged violation of RCW 42.17A.405 for accepting over-limit contribution in the 2020 election cycle

- Staff reviewed the Political Committee Registration (C1pc) filed by Clark County Is Not for Sale on January 1, 2019 and the Cash Receipts Monetary Contribution (C-3) report filed by Clark County Is Not for Sale on August 16, 2020, depicting a contribution of \$10,000 received from Don Welch on August 13, 2020. and found that the Campaign received two contributions of \$1000 (for a total of \$2,000) each, from Donald Welch and Brenda Ashworth on January 3, 2020. Staff noted that the contributions received were for both the primary and general, and further noted that the Campaign correctly checked the respective boxes on the C-3 report to clearly depict that the first donation of \$1,000 was for primary and the second \$1000 donation was for the general election. Based on this, the Campaign did not accept over limit contribution.
- Staff also reviewed the Political Committee Registration (C1pc) filed by Clark County Is Not for Sale on January 1, 2019 and the Cash Receipts Monetary Contribution (C-3) report filed by Clark County is Not for Sale on August 16, 2020. These reports were attached to the complaint as evidence of possible violation(s), depicting a contribution of \$10,000 received from Don Welch on August 13, 2020. Staff noted that these two reports belong to Clark County is Not for Sale Political Action Committee and not Matthew Little.
- In his response specific to the alleged violation of RCW 42.17A.405 for accepting over limit contributions, dated November 8, 2020, by way of Paula Little, Treasurer, the Campaign stated: “This complaint appears to be addressed to the wrong party. As the Independent Expenditure in question was made by Clark County is Not for Sale with no communications to our campaign, we had no obligation to report donations or expenditures involved. The donor mentioned did make contributions to our campaign, but we accept no responsibility for what other contributions were made by that individual.”

While staff found the Campaign's reporting deficient, Matthew Little was a first-time candidate with no prior PDC violations. Matthew Little's Campaign also fully acknowledged violations of RCW 42.17A.235, and .240, and fully cooperated with the PDC staff during the entirety of this review by timely responding to both complaints and making the corrections needed by amending the relevant C-4 reports to provide additional description and breakdown of campaign expenditures.

Based on the above staff has determined that, in this instance, the Campaign's failure to file accurate statutory reports and the failure to properly break down or describe monetary campaign expenditures, do not warrant further investigation.

However, Matthew Little will receive a reminder letter concerning his 2020 Campaign's failure to file accurate expenditure reports, as required by RCW 42.17A.235 and .240 for failure to properly break down or describe monetary campaign expenditures as required in WAC 390-16-037 and WAC 390-16-205 in the 2020 election year statutory reports. Matthew Little will be informed that the PDC staff expects his campaign to file timely and accurate statutory reports in the future.

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 Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Erick Agina, Compliance Officer

s/ _____
Barbara Sandahl, Deputy Director for
Peter Lavalley, Executive Director

cc: Matthew Little

