

**Respondent Name**

Matthew Little

**Complainant Name**

Glen Morgan

**Complaint Description**

[Glen Morgan](#) (Thu, 29 Oct 2020 at 1:52 AM)

To Whom it may concern,

It has come to my attention that Clark County is not for Sale PAC appears to have violated a variety of Washington State's campaign finance laws (**RCW 42.17A**) during the current 2020 general election in a Clark County Council race. The details of these violations are as follows:

**1. Failure to identify PAC Sponsor in the name of the PAC as required by law (Violation of RCW 42.17A.205(5), WAC 390-16-011a(2))**

Clark County is not for Sale PAC is a "sponsored committee" because it only has one \$10,000 donor (See **RCW 42.17A.005(48)**). As is clearly stated in **WAC 390-16-011a(2)**:

"A sponsored political committee must include on its C-1pc the name of at least one sponsor in the committee's name"

As is readily apparent in both this committee's C1PC (see attached **PDC Tracking #100879937**), their sole contribution report (See attached C3, **PDC Tracking #100992014**) clearly identifies the sole \$10,000 received on August 13, 2020 and used by this PAC during the election to come from Don Welch of Endicott City, Maryland. This PAC should have called itself "Clark County is not for Sale PAC, sponsored by Don Welch," but it failed to do so and explicitly violated the law.

This violation was continued on the mailers distributed by this PAC where the formal sponsorship was also not included in the disclosure statement at the bottom of the back of the flier (see attached). The PAC did identify Don Welch as the sole "Top 5 donor", but a continuing violation of **WAC 390-16-011a(2)** was committed with these mailers which were sent out in the 21 days before the election.

One political explanation for why this PAC attempted to conceal the sponsorship identification of the sole sponsor and funder of this PAC might be the fact that this dark money sponsor was an out of state relative of the candidate, Matthew Little who is running for office against the current incumbent Clark County councilmember who was targeted by these negative attack ad mailers. Regardless of the reasons for attempting to conceal the identity of the sponsor with this PAC mailer, this was not a good excuse to break the law.

Clark County may not be for sale, but this PAC certainly was, and only one person bought it. This sponsorship should have been accurately reported in the mailers, and on the C1PC.

**2. Failure to provide adequate detail of the number of mailers sent by this PAC as required by law (Violation of RCW 42.17A.235, RCW 42.17A.240, and WAC 390-16-037)**

There were very few expenditures by this PAC. It really isn't asking too much for this well-funded PAC with experienced consultants to get this right. However, they chose to conceal the quantity of mailers sent on their expenditure report filed Oct 27, 2020 (See attached C4 – **PDC Tracking #101011552**). This is an explicit violation of **WAC 39-16-037** Example B – which states "... the purpose must include the following details:

<b>Vendor Name</b>	<b>Purpose</b>	<b>Amount</b>
ABC Printing	5,000 brochures	\$3000

This is a well-known requirement to everyone involved in this PAC and their very experienced vendor, Win-Power Strategies (who nevertheless appears to be a serial PDC violator)

**3. Failure to report Earmarked Contributions (Violation of RCW 42.17A.270, WAC 390-16-033)**

There can be no doubt that the \$10,000 provided by Don Welch was earmarked for the purpose of assisting his friend/relative candidate Matthew Little who is running for the Clark County Council position. Don Welch is a maxed-out contributor to the Matthew Little campaign (See attached **PDC Report #100956625**). It should be noted that another person named "Brenda K. Ashworth" who resides at the same address as Don Welch in Ellicott City, Maryland (although this was reported erroneously on the C3 report as a "Washington" address, also maxed out their contributions to Matthew Little's campaign at the same time.

This PAC did nothing this year except take Don Welch's additional \$10,000 earmarked cash and spend it attacking Matthew Little's opponent. Mr. Welch's contribution was clearly earmarked for this cause, and the earmarked contributions were never reported as is required in **RCW 42.17A.270** and **WAC 390-16-033**.

**4. Failure to report legally required details on the Independent expenditure report (Violation of RCW 42.17A.260(3)(c), WAC 390-16-060)**

In addition to the violation described in Allegation #2 (see above) this PAC also concealed the required details clearly required in **RCW 42.17A.260(3)(C)**. As can be seen on the attached Independent Expenditure Report C6 (**PDC Tracking #10561**), these details are clearly lacking. They must disclose (and not continue to conceal) the total number of mailers sent out as this independent expenditure (see copies of these mailers attached).

Feel free to contact me if these violations are not clear or specific enough in this case.

Best Regards,

Glen Morgan

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

The public has a right to know that a maxed out out-of-state donor to a Clark County Council race has illegally earmarked \$10,000 to assist Matthew Little's campaign by attacking his opponent. The public has a right to know this earmarked contribution was never legally reported, the sponsorship of this PAC was concealed from the public, the required details of the mailers were not reported on either the expenditure reports or the special IE report (C6) filed by this committee. While Clark County may not be for sale, it is clear that the Clark County is not for Sale PAC certainly has been bought.

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

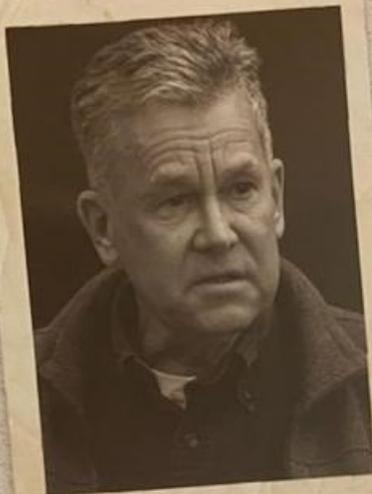
All documents are attached

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

The donor Don Welch from Maryland should be contacted directly. As an out-of-state donor he may have been misled by either Matthew Little himself or the vendor, or someone else involved in this PAC, and he may not have realized this crew wouldn't follow the law.

**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.



## Medviga does not follow the advice of local health experts.

“Medviga attended a rally for a Republican gubernatorial candidate where social distancing and mask-wearing were largely ignored... He also ineloquently challenged public health officials regarding the response to the virus, and posted a video in which he compared shutdown orders to martial law. If Medviga is reelected, he must demonstrate leadership rather than contributing to a culture that has prevented the county from fully emerging from shutdown orders.”

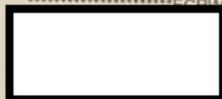
The Columbian • September 30, 2020

# VOTE GARY MEDVIGA OUT OF OFFICE

No candidate authorized this ad.  
It is paid for by Clark County is Not For Sale,  
PO Box 872514, Vancouver, WA 98687  
Top 2019-2020 contributor: Don Welch.



\*\*\*\*\*FCW\*SH\*\*R 015



PSRT ST  
US POSTAG  
PAID  
CAPITOL CIT  
PRESS



Gary Medvigy (R) with Loren Culp, Sept 2020

**COUNCILMEMBER  
GARY MEDVIGY  
IS NOT GETTING  
IT DONE FOR  
CLARK COUNTY.**

**We need leaders who will put  
aside partisan politics and  
get to work on the issues  
that are affecting families in  
every aspect of their lives.**



**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100992014

08-16-2020

Candidate or Committee Name (Do not abbreviate. Use full name.)  
**CLARK COUNTY IS NOT FOR SALE**

Mailing Address  
**PO BOX 872514**

City: **VANCOUVER, WA** Zip + 4: **98687** Office Sought (candidates): \_\_\_\_\_ Election Date: **2020**

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous .....		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
08/13/20	DON WELCH 4214 Buckskin Wood Dr Ellicott City, MD 21042				\$10,000.00	\$10,000.00
		Occupation: RETIRED				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$10,000.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$10,000.00

4. Date of Deposit: **08/13/20**

Treasurer's Daytime Telephone No.: **(360) 609-3527**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: **MARSHA MANNING** Date: **08-16-2020**

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
 101011552  
 10-27-2020

Candidate or Committee Name (Do not abbreviate. Include full name)  
**CLARK COUNTY IS NOT FOR SALE**

Mailing Address: **PO BOX 872514** City: **VANCOUVER, WA**

Zip + 4 <b>98687</b>	Office Sought (Candidates)	Election Date <b>2020</b>	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <b>independent expenditure</b> (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)
Report Period Covered <b>10/13/20</b>	From (last C-4) To (end of period) <b>10/26/20</b>	Final Report? Yes No <b>X</b>	

**RECEIPTS**

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) .....	\$	<b>\$10,549.71</b>
2. Cash received (From line 2, Schedule A) .....	\$	<b>\$0.00</b>
3. In kind contributions received (From line 1, Schedule B) .....		<b>\$0.00</b>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....		<b>\$0.00</b>
5. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-)	<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....		<b>\$10,549.71</b>
9. Total pledge payments due (From line 2, Schedule B) .....	<b>\$0.00</b>	

**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) .....		<b>\$0.00</b>
11. Total cash expenditures (From line 4, Schedule A) .....		<b>\$9,897.21</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....		<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....		<b>\$9,897.21</b>
14. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....		<b>\$9,897.21</b>

**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.:  
**(360) 609-3527**

**CASH SUMMARY**

18. Cash on hand (Line 8 minus line 17) .....	<b>\$652.50</b>
19. Liabilities: (Sum of loans and debts owed) .....	<b>\$0.00</b>
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	<b>\$652.50</b>

**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	Date	Treasurer's Signature	Date
		<b>MARSHA MANNING</b>	<b>10/27/20</b>

# CASH RECEIPTS AND EXPENDITURE

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

2

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

Report Date

10/13/20      10/26/20

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

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$           \$0.00

**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	
10/26/20	WINPOWER STRATEGIES 19550 International Blvd, Ste SeaTac, WA 98188		WINPOWER STRATEGIES, mailer: CapCityPress \$5743.20, Bluetone \$350, Winpower \$300	\$6,393.20
10/21/20	CAPITOL CITY PRESS 2975 37th Ave SW Tumwater, WA 98512		postage for mailer	\$3,504.01

Total from attached pages \$           \$0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$           \$9,897.21



Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**  
 **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**  
 **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

<b>1. Name and complete postal mailing address of sponsor:</b>  <b>CLARK COUNTY IS NOT FOR SALE</b> <b>PO BOX 872514</b> <b>VANCOUVER, WA 98687</b>	E-mail
	<b>CLARKCOUNTYFIRST@GM</b>
	Telephone <b>360-609-3527</b>

**2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.**

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/23/20	10/26/20	CAPITOL CITY PRESS 2975 37TH AVE SW TUMWATER, WA 98512	POSTAGE	3,504.01
10/26/20	10/26/20	WINPOWER STRATEGIES 19550 INTNATL BLVD STE 103 SEATAC, WA 98188	MAILER DESIGN & PRINT	6,393.20
Expenditures \$100 or less not itemized above				\$ 0.00

<b>Amount or Value</b>	Total this report	\$ 9,897.21
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 9,897.21

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
MEDVIGY, GARY	COUNTY COUNCIL MEMBER/CLARK CO	REPUBLIC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	\$ 9,897.21	\$ 9,897.21
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$

**Filer Name:**

**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) \_\_\_ An individual using only personal funds.
- b) \_\_\_ An individual using personal funds and/or funds received from others.
- c) \_\_\_ A business, union, group, association, organization, or other person using only general treasury funds.
- d) \_\_\_ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) **x** A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) \_\_\_ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) \_\_\_ Other

**If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.**

**5. Sources giving in excess of \$250 for the electioneering communication:**

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
08/13/20	WELCH, DON 4214 BUCKSKIN WOOD DR ELLCOTT CITY, MD 21042	, Occupation <b>RETIRED</b>	\$ 10,000.00
		Occupation	\$
		Sub-Total	\$ 10,000.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
<b>TOTAL FUNDS RECEIVED</b>			<b>\$ 10,000.00</b>

<b>Sponsor of Independent Expenditure or Electioneering Communication</b>			
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature	Printed Name <b>MARSHA MANNING</b>	
	Street address <b>PO BOX 872514</b>		
	City/State/Zip <b>VANCOUVER WA 98687</b>		
	Date Signed <b>10/26/20</b>	Place Signed (city and county) <b>VANCOUVER CLARK</b>	
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."		

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE  
 100956625  
 02-09-2020

Candidate or Committee Name (Do not abbreviate. Use full name.)  
**MATTHEW K LITTLE (Matt Little for Clark County)**

Mailing Address  
**PO Box 1051**

City: **Camas, WA** Zip + 4: **98607** Office Sought (candidates): **COUNTY COUNCIL MEMBER** Election Date: **2020**

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous .....		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L .....		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
01/03/20	CAREY S SMITH 17516 NE Stoney Meadows Dr Vancouver, WA 98682		X		\$100.00	\$100.00
		Occupation				
01/03/20	DONALD F WELCH 4214 Buckskin Wood Dr Ellicott City, MD 21042		X		\$1,000.00	\$1,000.00
		Occupation				
		RETIREED				
01/03/20	DONALD F WELCH 4214 Buckskin Wood Dr Ellicott City, MD 21042			X	\$1,000.00	\$1,000.00
		Occupation				
		RETIREED				
01/03/20	BRENDA K ASHWORTH 4214 Buckskin Wood Dr Ellicott City, WA 21042		X		\$1,000.00	\$1,000.00
		Occupation				
		RETIREED				
01/03/20	BRENDA K ASHWORTH 4214 Buckskin Wood Dr Ellicott City, WA 21042			X	\$1,000.00	\$1,000.00
		Occupation				
		RETIREED				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$4,100.00	*See reverse for details.
		Amount from attached pages			\$0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$4,100.00

4. Date of Deposit: **01/03/20**

Treasurer's Daytime Telephone No.: **(206)930-8638**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: **Paula Little** Date: **02-09-2020**