



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcca.wa.gov

October 26, 2021

Delivered electronically to Jack Dovey

Subject: Complaint regarding 2021 Jack Dovey Campaign, PDC Case 97938

Mr. Dovey,

Enclosed is a copy of an electronic letter sent to Connor Edwards concerning a complaint he filed on August 27, 2021, against your candidacy for Federal Way City Council in 2021. The complaint alleged that your 2021 Campaign may have violated RCW 42.17A.235 by failing to file a 7-Day Pre-Primary Summary Full Campaign Contributions and Expenditures report (C-4 report).

Pursuant to WAC 390-37-060(1)(d), you are receiving this formal written warning concerning your Campaign's lack of timely and accurate filing of reports of contribution and expenditure activities undertaken during the 2021 election, in accordance with RCW 42.17A.235 and .240. This formal written warning includes staff's expectation your 2021 Campaign will timely and accurately file PDC reports disclosing contribution and expenditure activities as required by law, including the 21-Day and 7-Day Pre-General Election C-4 reports for the 2021 election, and for future elections.

The Commission will consider the formal written warning in deciding on future Commission action if there are future violations of PDC laws or rules. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have any questions, please contact PDC Compliance Officer Kurt Young by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s

Electronically Signed Kurt Young
Compliance Officer

/s

Electronically Signed Peter Lavalley
PDC Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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October 26, 2021

Delivered electronically to Connor Edwards

Subject: Complaint regarding 2021 Jack Dovey Campaign, PDC Case 97938

Mr. Edwards,

The Public Disclosure Commission (PDC) staff has completed its review of the complaint you filed on August 27, 2021, against Jack Dovey, a candidate for Federal Way City Council in 2021. The complaint alleged the 2021 Jack Dovey Campaign (Campaign) may have violated RCW 42.17A.235 by failing to file a 7-Day Pre-Primary Summary Full Campaign Contributions and Expenditures report (C-4 report).

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and reporting requirements; the C-4 reports and amended C-4 reports, and Monetary Contributions reports (C-3 reports) filed by the Campaign, and the emailed responses from Mr. Dovey, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- On June 3, 2021, Jack Dovey filed a Candidate registration with the PDC declaring his candidacy for Federal Way City Council, Position #6, selecting the Full Reporting option and listing himself as Treasurer. Mr. Dovey is a former Federal Way Mayor and City Councilmember.
- On July 13, 2021, the Campaign timely filed the 21-Day Pre-Primary Election C-4 report disclosing \$704.92 in total candidate in-kind contributions had been received during the period. The in-kind contributions from Mr. Dovey were for stickers to place on old yard signs that were left-over from a prior campaign totaling \$423, stickers for the Federal Way Police endorsement to attach to the signs totaling \$246, and \$35.72 for yard sign stakes.
- On September 2, 2021, the Campaign filed an amended 21-Day Pre-Primary Election C-4 report disclosing the previously reported \$704.92 candidate in-kind contributions but included an additional \$3,198 for an additional candidate in-kind contribution. The \$3,198 in-kind contribution was received from Mr. Dovey on July 5, 2021, disclosed the description of the in-kind contribution to print and mail 4,000 political advertisements, and listed the vendor as Steve Beren.
- On September 2, 2021, the Campaign filed the 7-Day Pre-Primary Election C-4 report disclosing no contributions had been received or expenditures made during the period.

- Staff's review found that on September 2, 2021, the Campaign filed a C-3 report disclosing four itemized contributions that included a \$100 contribution received from an individual, two \$75 contributions were received two individuals and one small contributor. The C-3 report totaled \$770 and listed the contributions date of deposit as August 27, 2021.
- The C-3 report also disclosed a \$500 contribution had been received by the Campaign from the Federal Way Police Guild on June 30, 2021. The C-3 report indicated the \$500 contribution was held for more than five business days prior to being deposited. While the \$500 contribution from the Guild was deposited and disclosed late, it was not spent by the Campaign on 2021 primary election activities.
- Mr. Dovey stated that for the August 3, 2021, primary election he self-financed his campaign using "100 percent" of his personal funds to pay for Campaign expenditures. He stated he had some filing issues and found the reports that he thought he had filed, including the 7-Day Pre-Primary Election C-4 report, "were not actually filed as I did not submit them properly." He also acknowledged that he did not timely deposit or disclose the \$500 contribution he received from the Federal Way Police Guild.

Based on these findings, and the mitigating factors noted above, PDC staff found no evidence of a violation that would require conducting a more formal investigation into the complaint or pursuing any further enforcement action in this instance.

However, pursuant to WAC 390-37-060(1)(d), the PDC is issuing a formal written warning to the 2021 Jack Dovey Campaign concerning the lack of timely and accurate filing of reports of contribution and expenditure activities undertaken in accordance with RCW 42.17A.235 and .240. The formal written warning includes staff's expectation that the Jack Dovey Campaign will for the remainder of the 2021 election, and for future elections, timely and accurately file PDC reports disclosing contribution and expenditure activities as required by law.

The 2021 Jack Dovey Campaign will be advised that the Commission will consider this formal written warning in deciding on further Commission action, should there be future violations of PDC laws or rules. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, please contact Kurt Young by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s/
Electronically Signed Kurt Young
Compliance Officer

/s/
Electronically Signed Peter Lavallee
PDC Executive Director

cc: Jack Dovey Campaign