

<b>Respondent Name</b>
Shaun Scott
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<p><a href="#">Conner Edwards</a> reported via the portal (Fri, 8 Nov 2024 at 12:06 PM)</p> <p><b>Description of Complaint</b></p> <p>See attached complaint.</p> <p><b>Notice to Respondent</b></p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.</p> <p>Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <a href="https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/">https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</a></p> <p>If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.</p> <p>"The journey of a thousand miles begins with a single step." — Lao Tzu</p>
<b>What impact does the alleged violation(s) have on the public?</b>
See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.
<b>List of attached evidence or contact information where evidence may be found</b>
See complaint and also PDC website.
<b>List of potential witnesses with contact information to reach them</b>
See complaint and also PDC website.
<b>Certification (Complainant)</b>

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.

**Complaint Against: Shaun Scott****Submitted:** 11/8/24**Notice to Respondent by:** 11/18/24 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 2/6/25 per RCW 42.17A.755(3)**Statutes Violated:** RCW 42.17A.235, .240, .320**Background****Washington State's Campaign Finance Disclosure Law**

One of the primary purposes of the public disclosure law is to provide citizens of this state, and especially voters, with the means for becoming informed about the financing of political campaigns.<sup>1</sup> The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

**Reporting History of Respondent**

Now that the 2024 general election is over, Shaun Scott is newly elected representative from the 43<sup>rd</sup> District. He failed to file a number of C3/C4 reports that were due before the November general election that have still not been filed. In particular, he has failed to file the post-primary C4 report, the 21-day pre-general C4 report, and the 7-day pre-general C4 report. Additionally, many other political committees have reported making donations to his committee, but his committee has never reported receiving these.

The first PDC complaint against Shaun Scott was filed on June 23, 2024. In the intervening months between then and the general election, the agency has taken absolutely no meaningful action to address the noncompliance.

On September 3, 2024, Director Lavalley sent an "initial hearing" notice<sup>2</sup> to the Scott campaign. In the letter, Director Lavalley threatened "[i]f the PDC does not see substantive progress within 45 days, the respondent will receive a hearing notice to appear for an enforcement hearing".

45 days from 9/3/24 was 10/18/24. Director Lavalley's threat amounted to nothing as no hearing was scheduled even though the agency had an opportunity to schedule the matter for a hearing at both the October Regular meeting (on 10/24/24) and a BAP (on 10/29/24).

The agency's staff appear to be unable or unwilling to take any substantive action on the complaints against the Scott campaign. This is part of a pattern of PDC inaction.

Why should filers spend the time/money/energy to comply with the FCPA when the PDC can't be bothered to take cases to hearing? At this point, I can't really blame the Scott campaign for failing to file the reports at issue. Frankly, I think he is a lot smarter than the rest of us.

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<sup>1</sup> <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics>

<sup>2</sup> [https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/7074/155771%20Scott\\_Shaun%20Initial%20Hearing%20Results%20Letters%20%28Scott%29.pdf](https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/7074/155771%20Scott_Shaun%20Initial%20Hearing%20Results%20Letters%20%28Scott%29.pdf)

## **Violations**

On November 2, 2024, I contacted the Shaun Scott campaign and requested to view their books of account, since his campaign had not filed the reports described above. See below.

11/8/24, 11:29 AM

Gmail - Book Inspection Request



Conner Edwards <cg.edwards53@gmail.com>

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### **Book Inspection Request**

**Conner Edwards** <cg.edwards53@gmail.com>

Sat, Nov 2, 2024 at 12:01 PM

To: Shaun@betterwashington.org, organizewithshaun@gmail.com

Hello:

Per RCW 42.17A.235 and WAC 390-16-043, I am requesting to inspect the books of your 2024 political committee.

Here is a link from the PDC's website about the book inspection process: <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/public-inspection-campaign-records>

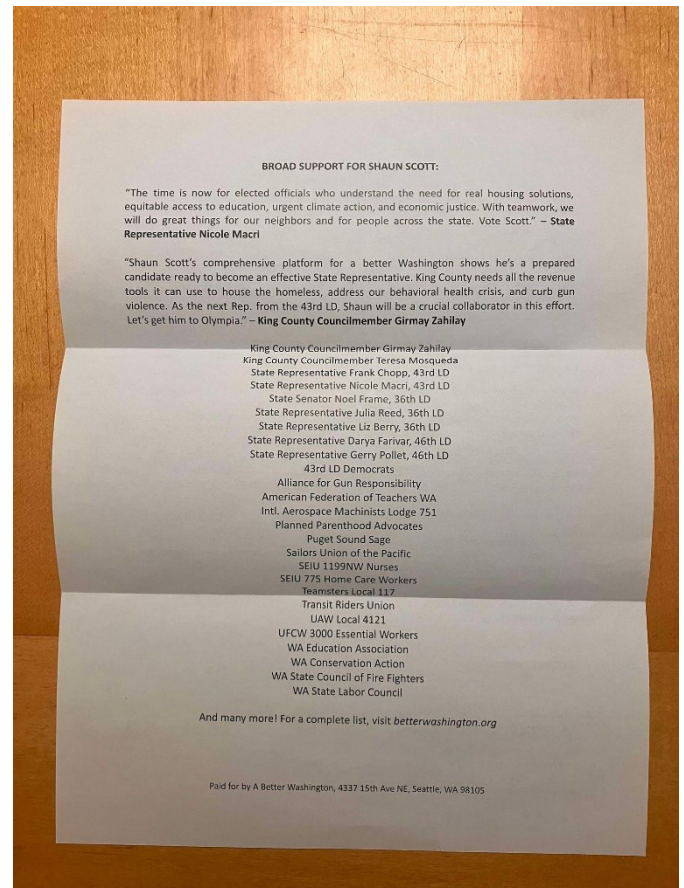
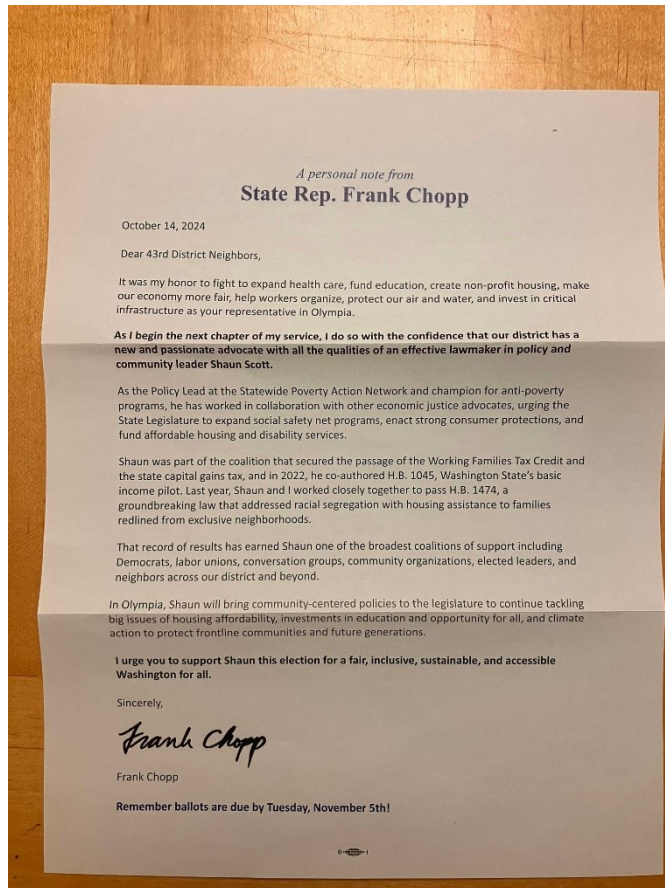
I would like to inspect the book on Monday (November 4, 2024) at 8:00 AM. It would be my preference to inspect the records digitally, but I'd also be willing to do it in person if that works better for your campaign.

If that time doesn't work, please let me know of another time that would work for you. I am happy to meet after hours or during the weekend if that works better for you.

Conner Edwards  
(425) 533-1677 cell

The Scott campaign did not provide a response to my request. This is a violation of RCW 42.17A.235(6) and WAC 390-16-043.

Additionally, the Scott campaign (I assume) sent out another mailer that included an inaccurate sponsor ID statement. See below. This was the same inaccurate sponsor ID statement that the campaign used in the primary. This is a violation of RCW 42.17A.320. The name of Scott's campaign committee is "The Fighting 43<sup>rd</sup>" not "A Better Washington".



## Conclusion

The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

I urge the PDC staff to take quick action and resolve the noncompliance identified in this complaint. Failing that, I look forward to reading yet another of the agency's "formal written warnings" at some point perhaps months or years down the road.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

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This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.

What are these shortcomings?

Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.

I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

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**— Lao Tzu**