

Respondent Name
Holly Cousens
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Mon, 19 Aug 2024 at 3:29 PM)</p> <p>Description of Complaint</p> <p>This respondent has previously received a warning letter for failure to timely/accurately file C4 reports, see link: https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/6442/150279%20Holly%20Cousens%20Case%20Resolution%20Letter.pdf</p> <p>It is interesting to note that agency staff did not even seem to review these reports before issuing a warning letter. If they had done so they would have noticed this glaring problem.</p> <p>Additionally, the PDC's warning letter said that: "The reports disclosed minimal contribution and expenditure activity that fell below the \$7,000 limit for a candidate choosing the Mini Reporting Option on their candidate registration. Mini reporting, had it been selected, would have relieved the candidate of filing expenditure reports."</p> <p>This is not accurate. See attached. The committee reported raising over \$11000 and spent over \$11000.</p> <p>On this committee's most recent C4, the committee indicated a negative cash on hand balance of -\$4,149.27, see link: https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110207829</p> <p>This suggests that the committee has failed to properly disclose/report expenditures or contributions.</p> <p>Additionally, this committee has failed to disclose the quantity of yard signs purchased on this C4: https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110153245 . The committee also failed to include the address of the sign vendor from which the signs were purchased.</p> <p>Notice to Respondent</p> <p>I apologize to you for any inconvenience caused by this complaint.</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Overcomplicated and outdated requirements that are difficult to understand and comply with.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 filers 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: https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</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>

“Be the change that you wish to see in the world.”
— Mahatma Gandhi

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

The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency’s failure to actively monitor the filings of committees and enforce filing requirements damages both the public and the candidates themselves.

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

PDC Website

List of potential witnesses with contact information to reach them

See respondent contact info on PDC website.

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.



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**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

COUSENS HOLLY N (Holly Cousens)
Holly Cousens -
411 Delmar Terrace
Yakima, WA 98902
CITY COUNCIL MEMBER
CITY OF YAKIMA

Coverage: 01/01/2024 to 01/31/2024
Final report: No
Report number: 110207829
Election year: 2023
Date submitted: 04/06/2024

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$6,900.52
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$6,900.52
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$10,327.92
11. Cash expenditures (Line 3 schedule A).	\$721.87	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$721.87
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$11,049.79

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		(\$4,149.27)
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		(\$4,149.27)

Candidate name

COUSENS HOLLY N (Holly Cousens)

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

Treasurer's name and date

Jeromy Nygaard - 04/06/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:				
2. TOTAL CASH RECEIPTS (LINE 2 OF C4):				\$0.00
3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):				
Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$128.87
01/30/2024	Nygaard Jeromy 20 Brathovde Rd , Selah, WA 98942	Accounting, legal, regulatory compliance, etc.: Accounting, legal, regulatory compliance, etc.		\$593.00
			\$0.00	\$721.87
4. TOTAL EXPENDITURES:				\$721.87

COUSENS HOLLY N (Holly Cousens)

Candidate for CITY COUNCIL MEMBER for CITY OF YAKIMA in the 2023 election.

Overview

[Contributions](#)

[Expenditures](#)

[Pledges](#)

[Debts](#)

[Loans](#)

[Independent Expenditures](#)

Candidate Overview

Registered March 8, 2023

📍 411 Delmar Terrace Yakima, 98902

✉ cousensforcouncil@outlook.com

Candidacy Status

- ↳ Candidate registered (3/8/2023)
- ↳ Candidate declared (5/15/2023)
- ↳ Qualified for general
- ↳ Lost in general

Financial Overview

\$100.52	+	\$11,350.00	+	\$0.00	=	\$11,450.52
Starting balance		Contributions		Loans		Total raised

\$11,017.79		\$0.00		\$0.00
Total spent		Pledges		Debt

\$2,064.98		\$0.00
Independent expenditures for		Independent expenditures against

Candidate Reports and Forms

[Registration Form](#)

[Financial Affairs Report](#)

[Surplus Funds Account](#)

[Contributors and Vendors Map](#)

Made to candidate for 2023

Contributions

See who has contributed cash and in-kind (non-monetary) contributions to the campaign.

Contributions made to candidate for 2023

Individual

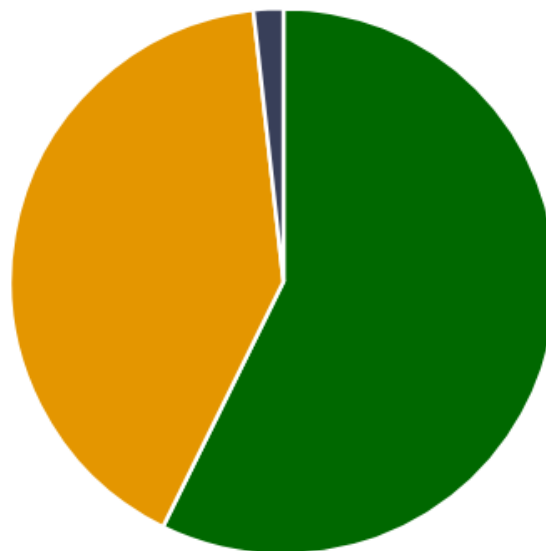
\$6,500.00

Business

\$4,650.00

Other

\$200.00



Made by candidate for 2023

Expenditures

See how the campaign has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2023

Other advertising

\$5,319.56

Not Provided

\$1,731.71

Postage costs, mail permits,...

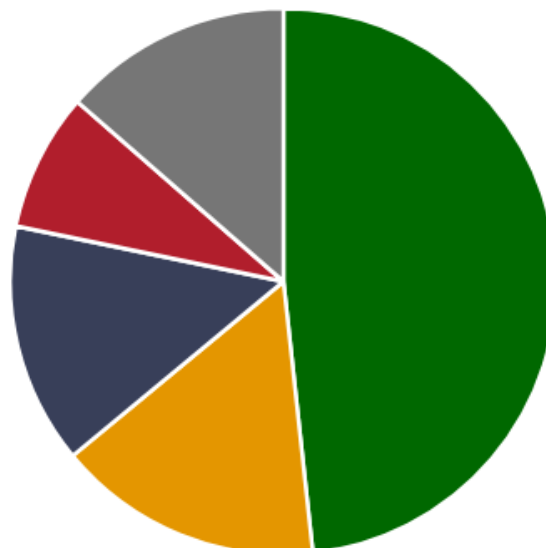
\$1,570.54

Wages, salaries, benefits,...

\$900.00

Miscellaneous

\$1,495.98



Candidates Filed for this Position

Show

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 entries Search:

***** declared candidates (eligible for election)

Candidate	Contributions	Expenditures
<u>COUSENS HOLLY N (Holly Cousens)</u> *	\$11,350.00	\$11,017.79
<u>Reedy Berg</u> *	\$3,782.50	\$3,774.01

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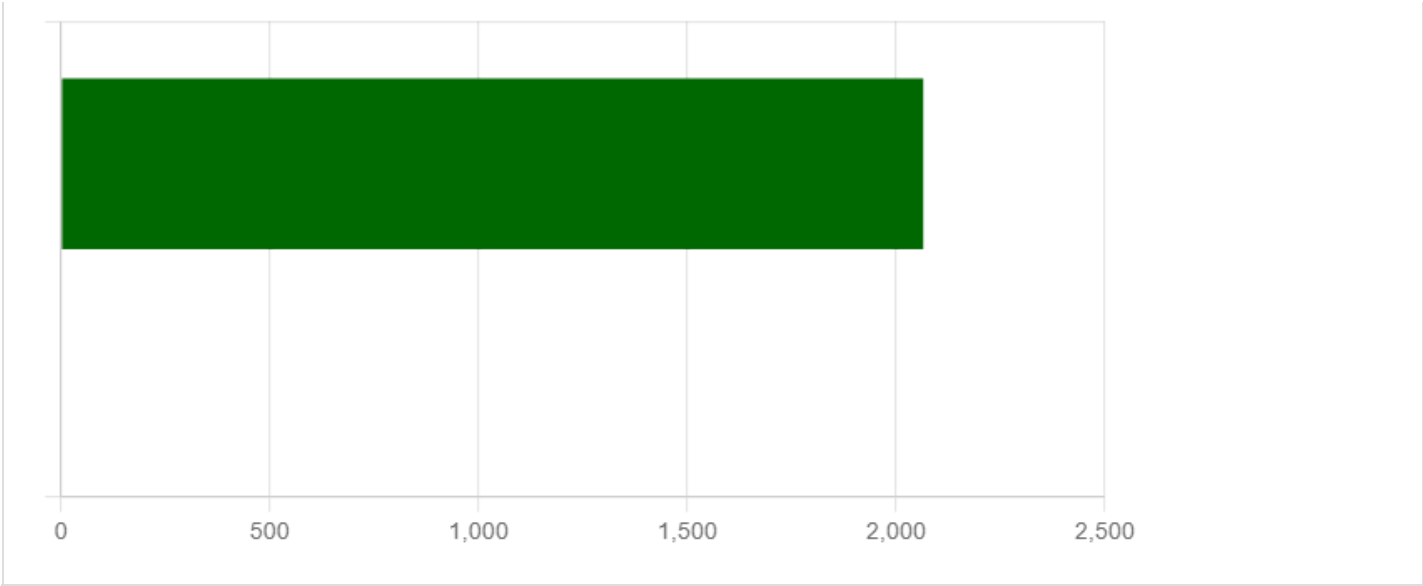
Spending for and against this candidate

Independent Expenditures

Independent expenditures are made by third parties that are not part of a candidate’s campaign.

Expenditures for and against this candidate

For candidate	Against candidate
\$2,064.98	\$0.00



Incurred by candidate

Debts

This information shows the debt for the campaign as of the submission date of the related report.

Outstanding debt for campaign is \$0.00

Campaign Finance Reports

See the reports filed by the candidate. Reports with a strikethrough were amended by another report.

Show entries

Download 19 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
10/30/2024 - 10/30/2024	110207817	04/06/2024	View Report	C3	2023

Period	Report Number	Filed	Report	Form Type	Election Year
01/01/2024 - 01/31/2024	110207829	04/06/2024	View Report	C4	2023
12/01/2023 - 12/31/2023	110207828	04/06/2024	View Report	C4	2023
10/31/2023 - 11/30/2023	110207827	04/06/2024	View Report	C4	2023
10/17/2023 - 10/30/2023	110207826	04/06/2024	View Report	C4	2023
09/01/2023 - 10/16/2023	110207825	04/06/2024	View Report	C4	2023
08/01/2023 - 08/31/2023	110206242 Amended by: 110207824	03/25/2024	View Report	C4	2023
08/01/2023 - 08/31/2023	110207824	04/06/2024	View Report	C4 - Amended	2023
07/07/2023 - 07/07/2023	110157124	07/09/2023	View Report	C3	2023
07/01/2023 - 07/31/2023	110206243 Amended by: 110207823	03/25/2024	View Report	C4	2023
07/01/2023 - 07/31/2023	110207823	04/06/2024	View Report	C4 - Amended	2023
06/16/2023 - 06/16/2023	110153241	06/17/2023	View Report	C3	2023
06/01/2023 - 06/30/2023	110157125 Amended by: 110157134	07/09/2023	View Report	C4	2023

Period	Report Number	Filed	Report	Form Type	Election Year
06/01/2023 - 06/30/2023	110157134	07/09/2023	View Report	C4 - Amended	2023
05/01/2023 - 05/31/2023	110153243 Amended by: 110153245	06/17/2023	View Report	C4	2023
05/01/2023 - 05/31/2023	110153245	06/17/2023	View Report	C4 - Amended	2023
04/18/2023 - 04/18/2023	110143416	04/18/2023	View Report	C3	2023
04/01/2023 - 04/30/2023	110146973	05/12/2023	View Report	C4	2023
03/08/2023 - 03/31/2023	110157127	07/09/2023	View Report	C4	2023

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