### **Respondent Name**

Paula Lamanna

### **Complainant Name**

**Conner Edwards** 

# **Complaint Description**

Conner Edwards reported via the portal (Thu, 17 Oct 2024 at 11:42 PM)

#### **Description of Complaint**

See attached complaint.

#### **Notice to Respondent**

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".

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Overcomplicated and outdated requirements that are difficult to understand and comply with.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: <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>

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.

"Be the change that you wish to see in the world."

— Mahatma Gandhi

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

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.

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

See complaint and also PDC website.

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

See complaint and also 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.

Complaint Against: Paula Lamanna

**Submitted:** 10/17/24

Notice to Respondent Due By: 10/27/24 per WAC 390-37-050(1) 90 Day Initial Hearing Deadline: 1/15/25 per RCW 42.17A.755(3)

**Statutes Violated: RCW 42.17A.235, .240** 

### **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. The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

State law requires candidates and committees that register under full reporting to submit regular reports of financial activity. Those reports are filed on schedules outlined on the PDC's key reporting dates calendar.<sup>2</sup>

### **Reporting History of Respondent**

This candidate has failed to file their 21-day pre-general C4 report. See attached, and also link: https://www.pdc.wa.gov/news/2024/pdc-sends-late-notices-41-candidates-missing-mandatory-reporting-deadline

### Conclusion

With the 2024 general election rapidly approaching, I urge the PDC staff to take quick action and resolve the noncompliance identified in this complaint.

Best,

/s/

Conner Edwards (425) 533-1677 cell

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

<sup>&</sup>lt;sup>2</sup> https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics/key-dates-2024

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# Paula Lamanna

Candidate for COUNTY COMMISSIONER for DOUGLAS CO in the 2024 election.

	ontributions <u>E</u>	<u>xpenditures</u>	<u>Pledges</u>	Debts Loans	Independent Expenditures
Candidate Over	view				
_	1ay 22, 2024				
Party: NONE					
• 4860 Pear In					
Rock island,					
□ paulalamana	<u>l@yahoo.com</u>				
Candidacy Stat	us				
- Candidata de					
→ Qualified for  Financial Overv		(4)			
→ Qualified for  Financial Overv	general iew				
→ Qualified for	general		= \$2,000 Total raise		
→ Qualified for  Financial Overv  \$0.00 Starting balance  \$1,642.77	general riew + \$2,000.00	+ \$0.00 Loans	Total raise	ed <b>\$</b> -	50.00
→ Qualified for  Financial Overv  \$0.00  Starting balance	general riew + \$2,000.00	+ \$0.00 Loans	Total raise	ed <b>\$</b> -	
→ Qualified for  Financial Overv  \$0.00 Starting balance  \$1,642.77	riew + \$2,000.00 Contributions	+ \$0.00 Loans	Total raise	ed <b>\$</b> D	<b>60.00</b> ebt

# **Candidate Reports and Forms**

Registration Form

Financial Affairs Report

Surplus Funds Account

Contributors and Vendors Map

## Made to candidate for 2024

# **Contributions**

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

# Contributions made to candidate for 2024

Other

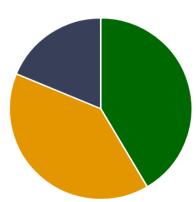
\$830.00

Self

\$795.00

Individual

\$375.00



# Made by candidate for 2024

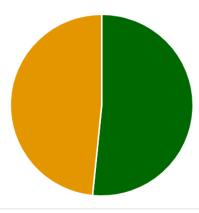
# **Expenditures**

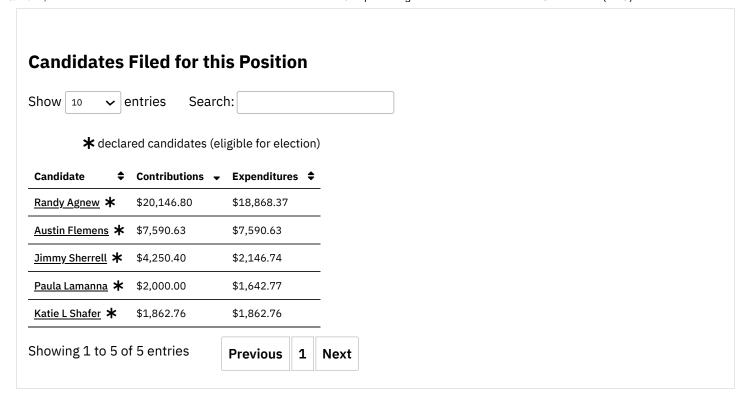
See how the campaign has spent money, and what kind of goods and services it received as in-kind contributions.

# Expenditures made by candidate for 2024

Campaign merchandise/paraphernalia \$847.77

Inkind contribution \$795.00





# Spending for and against this candidate

# **Independent Expenditures**

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

No independent expenditures reported.

### **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 25 ✓ entries

Download 14 rows as CSV.

Period	Report Number \$	Filed \$	Report \$	Form Type \$	Election Year
05/03/2024 - 08/31/2024	<del>110242178</del> Amended by: 110242184	09/04/2024	View Report	C4 - Amended	2024
05/03/2024 - 08/31/2024	<del>110242184</del> Amended by: 110245961	09/04/2024	View Report	C4 - Amended	2024
<del>05/03/2024 - 08/31/2024</del>	<del>110245961</del> Amended by: 110246135	09/17/2024	View Report	C4 - Amended	2024
05/03/2024 - 08/31/2024	110246135	09/19/2024	View Report	C4 - Amended	2024
05/06/2024 - 05/06/2024	110242004	09/03/2024	View Report	C3	2024
05/21/2024 - 05/21/2024	110242012	09/03/2024	View Report	C3	2024
<del>95/22/2024 - 08/31/2024</del>	<del>110241834</del> Amended by: 110242178	09/03/2024	View Report	C4	2024
05/22/2024 - 05/22/2024	110242003	09/03/2024	View Report	C3	2024
<del>05/29/2024 - 05/29/2024</del>	<del>110218385</del> Amended by: 110242000	06/03/2024	View Report	C3	2024
05/29/2024 - 05/29/2024	110242000	09/03/2024	View Report	C3 - Amended	2024
06/05/2024 - 06/05/2024	110242014	09/03/2024	View Report	C3	2024
06/06/2024 - 06/06/2024	110242015	09/03/2024	View Report	C3	2024
06/24/2024 - 06/24/2024	110242016	09/03/2024	View Report	C3 2024	
07/20/2024 - 07/20/2024	110241998	09/03/2024	View Report	C3	2024
howing 1 to 14 of 14 $\epsilon$	entries			Previo	ous 1 Nex

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