

Respondent Name
Raymond Clough
Complainant Name
Conner Edwards
Complaint Description
<u>Conner Edwards</u> (Thu, 4 Aug 2022 at 11:46 AM) See attached.
What impact does the alleged violation(s) have on the public?
See attached.
List of attached evidence or contact information where evidence may be found
See attached.
List of potential witnesses
See attached.
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.

Hello:

The candidate (RAYMOND CLOUGH) - 2018 appears to have failed to timely file C4s.

On 5/11/18, he filed a C1 indicating he was full reporting. Despite this, he never filed a single report.

This candidate appeared on the ballot in both the August and November 2018 elections.

<https://results.vote.wa.gov/results/20180807/klickitat/>

<https://results.vote.wa.gov/results/20181106/klickitat/>

Letter to Respondent

To Whom It May Concern:

I apologize for filing this complaint against your campaign/committee. It is not my intention to cause you any inconvenience. I am filing a batch of complaints against campaigns/committees that have failed to timely file C4s in recent election cycles to demonstrate the PDC's unwillingness to meaningfully enforce the statutory requirement to timely file C4s described in RCW 42.17A.235.

This is a relevant issue because the PDC appears poised to propose dramatically increasing the number of C4s that filers would be required to file in the month leading up to the primary and general elections. If this proposal were to be adopted by the Legislature, it would dramatically increase the amount of work that campaign treasurers and committees would be required to perform. The agency has offered little in the way of evidence to suggest that this proposal would result in any meaningful benefit to the voting public.

Currently, the agency does not actively investigate campaigns/committees to determine whether they have timely filed C4 forms. The agency *does* do this as it relates to the timely filing of C1/F1 forms. When adjudicating complaints alleging late C4 reporting, the PDC has leaned heavily on the use of "warning letters". These letters are, in essence, dismissals, and are not a meaningful deterrent for those who would engage in late reporting.

Put simply, the agency's rhetoric ("C4s contain valuable information for voters; any additional burden to filers stemming from increased reporting is justified") does not match the agency's actions (dismissing complaints that demonstrate filers haven't filed C4 reports on time).

By highlighting the agency's failure to meaningfully enforce current reporting deadlines, my hope is that the agency will look to improve its own enforcement procedures before saddling filers with additional reporting obligations.

No campaign treasurer or campaign/committee is perfect. Trying to comply with the myriad of requirements and deadlines the PDC enforces can be extremely difficult, even for those who have been doing this for years. The agency could adopt any number of strategies to help filers "get it right" when it

comes to deadlines and other requirements. Some of these strategies might include: a) automated electronic filing reminders to a filer when they have missed a deadline, b) mandatory attendance in a PDC training course before a person is allowed to serve as treasurer, and c) giving filers 48 hours to file 21- & 7-day pre-election reports as opposed to the 24 hours we currently get.

Sincerely,

Conner Edwards
Campaign Treasurer



RAYMOND CLOUGH

RAYMOND CLOUGH FOR COUNTY COMMISSIONER

Po Box 44

Dallesport, WA 98617

raymond@raymondclough.com

541-965-9840

Registration Filed

Candidate

Full Reporting

Submitted date: 2018-05-11

Certified by raymond@raymondclough.com, raymond@raymondclough.com

2018

CLOUR 617

Candidacy

Raymond Clough

Klickitat Co

County Commissioner

Position 2

Independent

raymond@raymondclough.com

Bank Information

Wells Fargo

The Dalles

The Dalles

To schedule books review contact raymond@raymondclough.com

Officers

Raymond Clough

Treasurer

Po Box 44

Dallesport, WA 98617

541-965-9840

Attachments

Name	Description
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