Respondent Name		
Robert Amenn		
Complainant Name		
Conner Edwards		
Complaint Description		
<u>Conner Edwards</u> (Sun, 28 Aug 2022 at 4:18 PM)		
See complaint.		
What impact does the alleged violation(s) have on the public?		
See complaint.		
List of attached evidence or contact information where evidence may be found		
List of potential witnesses		
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 committee "Robert Amenn" (2022) appears to have failed to timely file C4s.

This candidate filed as "full-reporting" however has not filed a single C3 or C4 report. This candidate would have been required to file a May C4 report because of the filing fee for this office being greater than \$200, and of course would have been required to file both the 21-day and 7-day pre-election report because he was on the ballot in the primary. See attached.

Robert Amenn also recently appeared before the agency at the August 25, 2022 regular meeting to seek an F1 modification, so he would appear to be aware of the existence of the PDC and some of the requirements that it enforces.

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



Robert Kenneth Amenn

Robert Kenneth Amenn 319 13th St Gold Bar, WA 98251 robert@albionnet.com 3604215119

Registration Filed

Candidate **Full Reporting** Submitted date: 2022-06-21 Certified by robert@albionnet.com

2022

AMENR--879

Candidacy

Robert Kenneth Amenn Leg District 12 - House State Representative Position State Representative Pos. 2 Republican robert@albionnet.com

Bank Information

Bank Of America 19917 Old Owen Rd Monroe, WA 98272 To schedule books review contact robert@albionnet.com

Officers

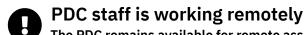
Robert Amenn

Candidate Treasurer 319 13th St Gold Bar, WA 98251 robert@albionnet.com 3604215119

Candidate is treasurer.

Attachments

Name Description



The PDC remains available for remote assistance, consistent with the governor's emergency proclamations. Please contact us for assistance at (360) 753-1111 or pdc@pdc.wa.gov.

For Voters & the Public For Candidates For Political Committees For Incidental Committees For Lobbyists For Elected Officials

Robert K Amenn - 2022

Candidate Information

Office:

STATE REPRESENTATIVE

Jurisdiction:

LEG DISTRICT 12 - HOUSE

Party:

REPUBLICAN

Registration:

June 21, 2022

Address:

319 13TH ST GOLD BAR, WA 98251

Email:

ROBERT@ALBIONNET.COM

Phone:

3604215119

Financial Information

No data available.

Status

Primary

Election Status:

Qualified for general

Campaign

Status:

Candidate declared

Reports

Candidate's

Personal Financial

Affairs disclosure

Candidate's

surplus funds

account

Independent Expenditures

spending for and against this candidate

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

No Independent Expenditures reported

See Independent Expenditures

Debts

incurred by candidate

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

Outstanding debt for campaign is \$0.00

See Debts

Campaign Finance Reports

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

No reports found for this candidate

Contact Us For Candidates

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Other Election Agencies For Elected Officials

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August 2, 2022 Primary Results

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LEGISLATIVE DISTRICT 12 - State Representative Pos. 2

Last updated on 08/16/2022 4:29 PM

LEGISLATIVE DISTRICT 12 - State Representative Pos. 2

County Results & Map

Candidate	Vote	Vote %
Robert K Amenn	(Prefers Republican Party) 4,681	14.37%
Mike Steele	(Prefers Republican Party) 26,249	80.56%
WRITE-IN	1,652	5.07%
Total Votes	32,582	