Respondent Name

John Svilarich

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan reported via the portal

(Fri, 27 Oct 2023 at 1:48 AM)

To whom it may concern,

It has recently come to my attention that John Svilarich, during his current campaign for the Camas City Council appears to have violated Washington State's Campaign Finance laws (RCW 42.17A). The details are as follows:

Background:

In order for PDC staff to properly process this complaint, some basic background is needed to understand why these violations were discovered. Please note, this complaint is intertwined a bit with a recent complaint I filed against Steve Hogan, candidate for Mayor in the City of Camas which the PDC has already received.

Both Steve C. Hogan ("Hogan") and John Svilarich ("Svilarich") are current Camas City candidates for Mayor and City Council, respectively. Although each are running for different elected positions, both candidates have been campaigning together at various events in Camas, including a recent "Meet & Greet" held at Heritage Park on Sunday, October 22, 2023. To encourage citizen attendance, the Hogan/Svilarich Heritage Park Meet and Greet was advertised in a local on-line, digital magazine. (See Attachment 1, screenshot of paid political advertisement on Facebook). This advertisement benefitted both the Hogan campaign and the Svilarich campaign. However, Hogan paid the on-line, digital magazine for the advertisement out of his campaign funds alone.

The coordination of their two campaigns does not end there. Both Hogan and Svilarich have combined their political print advertising collateral together into plastic bags left on Camas citizen's front doorknobs or on front porches at various times during their campaigns. Both Hogan and Svilarich have announced via social media times when they would be out canvassing neighborhoods together and inviting volunteers to join them. Neither candidate nor their supporters hid the fact that they were combining efforts at various times and in various ways in the attempt to win their general elections.

In October 2023, both Hogan and Svilarich sent political advertisements to Camas houses via USPS direct mail. Both candidates' political advertisements were sent out and received by Camas citizens at or around the same time. Both candidate's political advertisements were sent from the same out-of-Camas location, zip code 98642 (Ridgefield). And, both candidates did not specify the individual, organization, business, party or committee that sponsored (paid for) the political advertisement.

Upon review of current PDC expense reporting, Svilarich has not reported any expenses towards his campaign – including any expenses for direct mail efforts. However, upon review of Hogan's C-4 reports, he disclosed two expenses on October 16, 2023 (See PDC C-4 tracking # 110180206, attached for staff reference)

VENDOR NAME COST PURPOSE OF EXPENSES

Minuteman Press \$3,539.22 Printing literature, fliers, postcards, etc.: Two waves of mailers – Printing costs
Minuteman Press \$5,827.74 Printing literature, fliers, postcards, etc.: Two waves of mailers – Mail services and Postage Costs

See PDC C4 Tracking #110180206, attached for staff reference - note expenses from Hogan's C-4 report.

These expenses were reported by Hogan on or around the time both Hogan's and Svilarich's political advertisements were sent to Camas residents. Usually, a candidate's direct mailer is sent to roughly 10,000 Camas residences. With postage costing approximately \$0.49 per mailer, one mailer costs a candidate around \$5,000. 2 mailers would cost approximately \$10,000, much in line with Hogan's expenses noted above totaling \$9,366.96. However, despite paying for two mailers, it appears that Hogan only sent one mailer to Camas residents related to his re-election campaign.

1) Failure to provide proper sponsor identification on political advertisement (Violation of RCW 42.17A.320)

The failure to provide legally required sponsor identification on Svilarich's Political Advertisement mailer, attached front and back for staff reference is obvious. Disclosure of sponsorship for political advertisements is required by law (See RCW 42.17A.320). The sponsorship identification must include the words "Sponsored by" or "Paid for by" followed by the name of individual, organization, business, party or committee that paid for the political advertisement. Hogan's direct mail political

advertisement did not contain the sponsorship identification required by law as is obvious in the attached images of this flyer. Please note, I included the Hogan Mailer images in this complaint as well, simply for staff reference.

2) Violation of Mini-Reporting limitation by accepting in-kind contributions far in excess of \$500 (Violation of WAC 390-16-105(2)(b))

Based upon the facts summarized above, it is reasonable to allege that Hogan may have paid for and mailed out Svilarich's political advertisement to Camas voters. Both candidates were known to be openly campaigning together, Hogan had previously paid for digital advertising benefitting both campaigns, both direct mailers were sent out at the same time and from the same location, both mailers omitted sponsorship identification which is required by law, and Hogan reported on his C-4 report that he paid for printing and postage equivalent for TWO mailers around the time both mailers were delivered to the voters of the City of Camas.

If the PDC investigation finds that Hogan paid for and sent Svilarich's direct mailer, he failed to provide the proper sponsorship identification as required by law, and more relevant to the allegation referenced above, Svilarich's campaign clearly accepted an illegal overlimit in-kind contribution to his mini-reporting campaign far in excess of the statutory maximum of \$500 allowed under WAC 390-16-105(2)(b). The fact that Hogan's political campaign can't legally use campaign funds to pay for a different political campaign's expenditures is a legal problem for Hogan, but it is Svilarich's violation for accepting the illegal overlimit in-kind contribution.

It seems almost certain that this candidate needs to provide evidence to the PDC of exactly how many other campaign activities were paid for by different candidates and how many other illegal overlimit contributions he may have received in violation of the law.

I'm sure I can find more obvious violations of the law if I spent a bit more time looking at this campaign, but I have a few other complaints I need to process before I go to sleep tonight, so I'll leave it at this for now, which is clearly enough to get this investigation going. If I find any additional violations, which seems likely, I'll add them as supplemental complaints to this one.

Let me know if you need any additional information.

Best Regards,

Glen Morgan

(For Internal PDC Staff reference – based on my written testimony submitted to the PDC last month, I am counting this as complaint #14 for October)

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

This is a case where it appears a politician pretends to be running a "mini-reporting" campaign but they are actually abusing the privilege of running a low-paperwork and transparency campaign by accepting illegal overlimit in-kind contributions illegally provided by a fellow politician illegally using their political funds to do so. This is just a weird case that can't get better the deeper you dig.

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

All attached and referenced in the body of the complaint

List of potential witnesses with contact information to reach them

Both politicians and their treasurers, and the vendors who helped them. Probably staff should subpoena the bank records here as well.

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.

For Camas City Council

Experienced

John has been supporting the community for over 21 years. John has successfully worked with the city, the school district and the Port.

Knowledgeable

John has deep institutional knowledge of how the council and the city works. Very few have his background and knowledge. He will be able to hit the ground running!

Transparent

John has no personal agenda other than to see Camas be the best it can be for all. John is not beholding to large donors or special interest groups.

John believes that local politics and government should easily be civil and reasonable. John listens to all sides and looks for a way forward to resolve the issue.

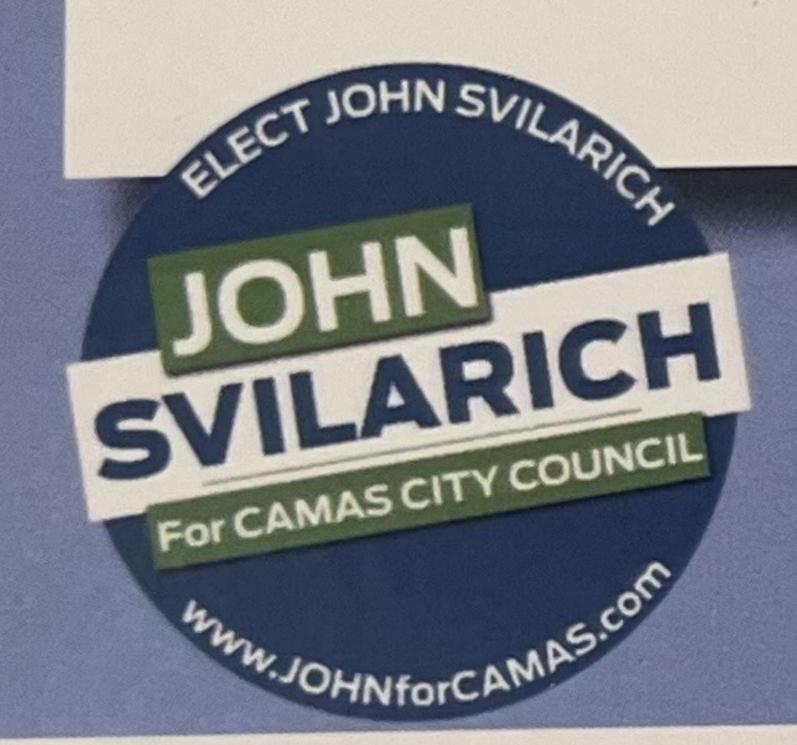
Decisive

John is not one to "kick the can down the road" as has been done so many times in Camas. Even if the issue is unpleasant or difficult, John will be decisive.

John Svilarich is endorsed by many Camas residents including:

- Nan Henriksen, former Camas Mayor and Clark County First Citizen
- Mary Beth Hogan, Sunningdale Gardens neighborhood, Camas
- Jennifer McDaniel, Camas resident and former Washougal City Council
- Holly Jacobs, Former President Clark County YWCA, Grand Ridge Camas
- Marilyn Boerke, Camas City Councilor and Director of Secondary
 Education for Camas School District
- Erika Cox, Camas School Board Director
- Vicky Wessling, Red Cross Board of Directors, Three Rivers HOA Board, Camas
- Bamini Pathmanathan, Camas School Board Director
- Corey McEnry, Camas School Board President

- Deanna Rusch, Co-President of the West Columbia Gorge Humane Society and former Camas City Council member
- Cara Helmke, Lake Ridge neighborhood, Camas
- Brenda Alling, Grand Ridge neighborhood, Camas
- · Josef and Errine Lubisich, Sundance neighborhood, Camas
- Jeanette Caples, lifelong Camas resident, Mountain View neighborhood,
 Camas
- . Mark Daniels, Deer Creek neighborhood, Camas
- Casey O'Dell, Lifelong Camas resident and former Camas School Board
 Director
- John and Marian Neumann, Sunningdale Gardens, Camas



To see John Svilarich's endorsements visit:

www.johnforcamas.com

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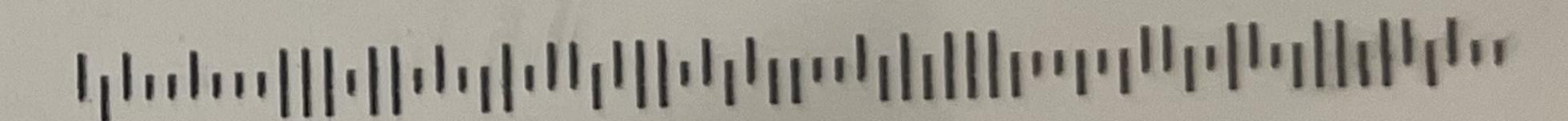
Or Current Voters at

Camas, WA 98607

U.S. Postage Paid

Mailed From 98642

Permit No 94





Experience Matters.
Even More.

Especially Here.

On November 7, 2023, Camasonians will vote on our city's future.

It takes an experienced, steady hand to ensure that our city remains safe, beautiful, and welcoming. It takes someone deeply rooted in our community, with decades of public service and proven leadership experience.

That person is Steve Hogan.

Please join us in voting Steve Hogan for Camas mayor!

With a full four-year term, Mayor Hogan will build upon the remarkable accomplishments of his first two years. Steve will:



Keep Camas a Safe, Livable, Beautiful City

- Ensure Camas remains an open, inclusive community with a "home-town" feel.
- · Keep Camas a safe place to walk at night.
- Continue his work to restore Lacamas Lake to enable a full range of recreational uses.



Support a Thriving Camas

- Ensure the implementation of sensible plans, balanced development and infrastructure to help our city flourish.
- Implement the North Shore Subarea Plan with public involvement and a balanced mix of public and private uses.
- · Continue to make our award-winning city government more open, effective, and efficient.



Healthy Partnerships

City government can't do it all. Mayor Hogan will continue to foster healthy partnerships in the public, private, and non-profit sectors. Mayor Hogan's successful partnerships include:

- · Camas Public Schools: helped secure funding to improve school safety.
- State and regional governments: secured funding grants to reduce homelessness, improve park facilities, and remediate pollution and algae in Lacamas Lake.

Re-elect Steve Hogan

CAMAS MAYOR

Re-elect Steve Hogan Camas Mayor 4535 NW Aspen St. Camas, WA 98607



Learn more at

ElectSteveHogan.com

U.S. Postage Paid Mailed From 98642

PRSRT STD

Permit No 94

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Resident

Camas, WA 98607-

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Photo ~



Done



LACAMAS MAGAZINE

10m - 🚱

Meet and Greet The Candidates Event! Happening October 22 at 11 am at Heritage Park parking lot in Camas.

THIS IS A PAID CAMPAIGN ADVERTISEMENT

VOTE VOTE VOTE

CAMAS MAYOR, COUNCIL

MEMBERS, CANDIDATES

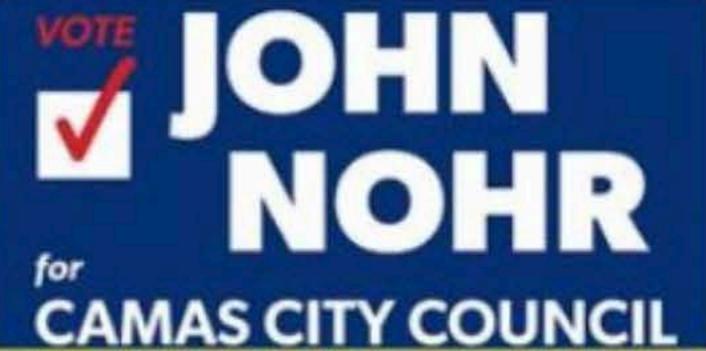
MEET AND GRET

MEET YOUR CANDIDATES GET TO KNOW US

OCTOBER 22, 2023 SUNDAY AT 11 AM HERITAGE PARK PARKING LOT







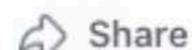


1 comment



Like







Heather Gulling

So city incumbents decided to make a last minute "pop-up event" on the same day and time, and almost same location as the event that Acorn & The Oak is putting on drawing attention to their plight with the Everett Corridor plans? This reads to me as tone-deaf. Neighbors, please consider sponsoring our beloved Acorn & The Oak as they try to navigate their business.

https://www.facebook.com/search/top?q=acorn%20%26%20the%20oak



Like Reply











711 Capitol Way Suite 206 PO Box 40908 Olympia, WA 98504-0908 (360) 753-1111 Toll Free 1-800-601-2828

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

Steve C. Hogan (Steven C. Hogan)

Steven C. Hogan -4535 NW Aspen Street Camas, Washington 98607

MAYOR

CITY OF CAMAS

Coverage: 09/01/2023 to 10/16/2023

Final report: No

Report number: 110180206

Election year: 2023

Date submitted: 10/16/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$15,626.87
2. Cash received (Schedule A line 1).	\$12,955.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$12,955.00
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).		\$28,581.87
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).		\$2,962.07
11. Cash expenditures (Line 3 schedule A).	\$2,809.60	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$2,809.60
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).		\$5,771.67
CASH SUMMARY		
18. Cash on hand (Lines 8 - 17)		\$22,810.20
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$15,254.83
20. Balance (Lines 18 - 19)		\$7,555.37

Candidate name

Steve C. Hogan (Steven C. Hogan)

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

Treasurer's name and date

Jenny Quan Wu - 10/16/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
09/05/2023	\$600.00	09/25/2023	\$1,440.00	10/16/2023	\$2,290.00
09/08/2023	\$1,200.00	10/02/2023	\$25.00		
09/18/2023	\$6,250.00	10/09/2023	\$1,150.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4):

\$12,955.00

\$2,809.60

\$9,267.96

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		\$759.53
09/03/2023	MINUTEMAN PRESS 302 NE 6th Ave. , Camas, WA 98607	Printing literature, fliers, postcards, etc. : Campaign literature printing- 5,000 slim jims		\$1,150.62
09/13/2023	HOGAN MARY BETH 2422 NW 47th Ave , Camas, WA 98607	Campaign merchandise/paraphernalia: Reimburse Mary Beth Hogan for Campaign T- shirts and Office supplies		\$614.46
10/10/2023	HOGAN MARY BETH 2422 NW 47th Ave , Camas, WA 98607	Campaign merchandise/paraphernalia: Candy for various campaign event		\$19.49
10/10/2023	HOGAN MARY BETH 2422 NW 47th Ave , Camas, WA 98607	Computers, printers, software, phones, etc.: Reimburse Mary Beth for Payment of VoteBuilders		\$265.50
10/16/2023	MINUTEMAN PRESS 302 NE 6th Ave. , Camas, WA 98607	Printing literature, fliers, postcards, etc. : Two waves of mailers - printing costs	\$3,539.22	
10/16/2023	MINUTEMAN PRESS 302 NE 6th Ave. , Camas, WA 98607	Printing literature, fliers, postcards, etc.: Two waves of mailers-Mails services and Postage costs	\$5,728.74	

4. TOTAL EXPENDITURES: \$12,077.56

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

No in-kind contributions reported this period

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

First debt incurred	Recipient/Vendor	Balance owed (as of this reporting period)
10/16/2023	MINUTEMAN PRESS	\$9,267.96
	302 NE 6th Ave. , Camas, WA 98607	

Schedule L: Loans

1. LOANS RECEIVED:

No loans received this period

2. LOAN PAYMENTS

No loans payments reported this period

3. LOANS FORGIVEN:

No loans forgiven reported this period

4. LOANS STILL OWED

Date	Lender	Original Amount	Principal Repaid or Forgiven	Amount Owed
04/27/2023	Steven C. Hogan	\$1,986.87	\$0.00	\$1,986.87
07/27/2023	HOGAN STEVEN C 4535 NW Aspen Street , Camas, WA 98607	\$4,000.00	\$0.00	\$4,000.00