



State of Washington

PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission BAP Staff Memorandum

Michael Cannon: PDC Case 149617

- On March 16, 2023, Michael Cannon filed a Candidate Registration (C-1 report) with the PDC, declaring his candidacy for the office of School Director, Position #4 in the Mead School District, selecting the Full Reporting Option for the 2023 election cycle, and listing himself as Treasurer.
- Mr. Cannon is a third-time candidate seeking public office in 2023, and was re-elected as a Mead School District School Director, after being elected to that office in 2019 (\$10,500 in contributions received and \$8,105 in expenditures made). He ran for Spokane City Council District #3, Position No. 2 in 2013, and was defeated in the general election (\$68,222 in contributions received and \$64,573 in expenditures made).
- Staff is alleging that Mr. Cannon violated RCW 42.17A.235 by failing to timely file the 7-Day Pre-General Election Summary Full Campaign Contribution and Expenditure Report (C-4 Report), as required for a 2023 candidate appearing on the November 7, 2023 general election ballot.
- For the 2023 election cycle, a 7-Day Pre-General Election C-4 report to be filed on October 31, 2023, covering the period October 17 through October 30, 2023
- The 2023 People for Michael Cannon (Campaign) filed the initial 7-Day Pre-General Election C-4 report 10 days late on November 9, 2023, and two days after the November 7, 2023 general election had been held. The initial C-4 report disclosed \$300 in contributions received and \$0 Campaign expenditures made.
- On November 21, 2023, the Campaign filed an amended 7-Day Pre-General Election C-4 report disclosing the same \$300 in contributions received, but the report included \$9,242 in previously unreported Campaign expenditures made. The amended C-4 report disclosed new expenditures that included political advertisements sponsored by the Campaign totaling \$6,084 for two mailers; \$2,948 for two text "Robocalls (10,991 and 10,0630); and \$211 to print "Palm Cards."
- In addition, staff's review found that it appears the Campaign received three in-kind contributions from the Washington State Republican Party totaling \$3,667 on November 3 and 4, 2023, that should have been reported on a Last-Minute Contribution (LMC) Report filed within 48 hours of receipt.
- Mr. Cannon has no prior violations of RCW 42.17A or WAC 390.
- On March 6, 2024, PDC staff sent an email to Mr. Cannon informing him that his Campaign disclosed expenditure information late and after the 2023 general election. The email communication went on to state that the level of late reported expenditure activity was at the amount, that issuing a warning letter to resolve the case was not sufficient.

- PDC staff informed Mr. Cannon that staff would be sending him a Statement of Understanding (SOU) shortly, for him to complete acknowledging a violation of RCW 42.17A.235 and pay a \$150 civil penalty as an alternative resolution to scheduling a Brief Adjudicative Proceeding (BAP).
- On March 7, 2024, PDC staff sent a follow-up email to Mr. Cannon, attached a PDF copy of the proposed SOU, and requested it be completed by him and mailed back to the PDC along with the \$150 penalty payment no later than March 25, 2024.
- On March 22, 2024, Mr. Cannon responded to staff's email concerning the proposed SOU stating that he was "in all honesty, I was just going to sign this and, as it says, 'avoid the time and expense'. But I think I'd like to have a hearing by the Presiding Officer at a BAP. I'd like to bring up a few points about the circumstances, the info mentioned in this letter as well as the workings of the online system, that I believe are relevant."
- On March 27, 2024, PDC staff sent an email informing Mr. Cannon that based on his email request, staff would be scheduling several BAP Hearings around May 1, 204, and that he would be sent a BAP hearing notice soon.

s/_____
Electronically Signed Kurt Young
PDC Compliance Officer

