# **Respondent Name**

Lewis County Democratic Central Committee - Non Exempt

# **Complainant Name**

**Conner Edwards** 

# **Complaint Description**

Conner Edwards reported via the portal (Wed, 23 Oct 2024 at 1:18 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Overcomplicated and outdated requirements that are difficult to understand and comply with.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

# 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.



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# **Damian Bean (Damian A Bean)**

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

Overview         Contributions         Expenditures         Pledges         Debts         Loans         Independent	itures
---	--------

#### **Candidate Overview**

Registered March 5, 2024

- PO Box 851 Centralia, WA 98531
- <u>bean4commisioner@gmail.com</u>

# **Candidacy Status**

- → Candidate registered (3/5/2024)
- → Candidate declared (5/6/2024)
- → Qualified for general

#### **Financial Overview**

**\$0.00**Starting balance + **\$6,073.91**Contributions + **\$0.00**Loans = **\$6,073.91**Total raised

**\$3,543.05 \$0.00 \$0.00**Total spent Pledges Debt

\$0.00 \$0.00

Independent expenditures for Independent expenditures against

# **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

Individual

\$3,090.00

Other

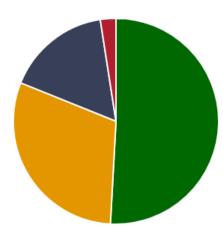
\$1,834.75

Party

\$1,000.00

Self

\$149.16



# 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

Other

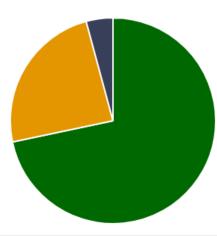
\$2,540.00

**Not Provided** 

\$853.89

**Inkind contribution** 

\$149.16



# **Candidates Filed for this Position** Show 10 entries Search: \* declared candidates (eligible for election) Candidate **♦** Contributions **→** Expenditures **♦** Sean Swope \* \$43,562.00 \$30,462.28 Damian Bean (Damian A Bean) \* \$6,073.91 \$3,543.05 \$2,000.00 \$6,557.78 Peter N. Lahmann Jr. \* Showing 1 to 3 of 3 entries Previous Next

# 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 ventries

Download 30 rows as CSV.

Period •	Report Number \$	Filed \$	Report \$	Form Type 💠	Election Year 💠
10/05/2024 - 10/05/2024	110248957	10/03/2024	<u>View Report</u>	C3	2024
09/11/2024 - 09/11/2024	<del>110244957</del> Amended by: 110244959	09/12/2024	View Report	C3	2024

Period -	Report Number	<b>+</b>	Filed \$	Report \$	Form Type 💠	Election Year
09/11/2024 - 09/11/2024	110244958		09/12/2024	View Report	C3	2024
08/24/2024 - 08/24/2024	110244956		09/12/2024	View Report	С3	2024
08/19/2024 - 08/19/2024	110244959		09/12/2024	View Report	C3 - Amended	2024
08/14/2024 - 08/14/2024	110238203		08/12/2024	View Report	C3	2024
08/12/2024 - 08/12/2024	110238197		08/12/2024	View Report	C3	2024
08/02/2024 - 08/02/2024	110238202		08/12/2024	View Report	C3	2024
07/24/2024 - 07/24/2024	110238199		08/12/2024	View Report	C3	2024
07/16/2024 - 07/29/2024	110238204		08/12/2024	View Report	C4	2024
07/02/2024 - 07/02/2024	110228372		07/10/2024	View Report	C3	2024
06/24/2024 - 06/24/2024	110228370		07/10/2024	View Report	C3	2024
06/20/2024 - 06/20/2024	110228398		07/10/2024	View Report	C3	2024
06/17/2024 - 06/17/2024	110228371		07/10/2024	View Report	C3	2024
06/06/2024 - 06/06/2024	110220801		06/10/2024	View Report	C3	2024
06/03/2024 - 06/03/2024	110217853		06/03/2024	View Report	C3	2024
06/03/2024 - 06/03/2024	110228369		07/10/2024	View Report	C3	2024
06/01/2024 - 07/15/2024	110230490		07/16/2024	View Report	C4	2024
05/27/2024 - 05/27/2024	110217851		06/03/2024	View Report	C3	2024
05/07/2024 - 05/07/2024	110217849		06/03/2024	View Report	C3	2024
05/06/2024 - 05/06/2024	110217848		06/03/2024	View Report	C3	2024
05/03/2024 - 05/03/2024	110213632		05/09/2024	View Report	C3	2024
05/01/2024 - 05/31/2024	110221186		06/10/2024	View Report	C4	2024
04/30/2024 - 04/30/2024	110213637		05/09/2024	View Report	C3	2024
04/30/2024 - 04/30/2024	110213638		05/09/2024	View Report	C3	2024
howing 1 to 25 of 30 e	entries				Previous	1 2 Ne

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# **Key Dates: 2024**

These dates are also found on the PDC's <u>Calendar of Events</u>.

Key dates for 2024 special elections are also available.

Within two	Register the campaign. (Candidates also file an F-1.)
weeks of	register the earnpaigh. (candidates also like any 1.)
organizing	NOTES: Committees organizing within three weeks of election must register within 3 business days of organizing. File
or becoming	an amended registration within 10 days of any changes.
a candidate	
January 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Dec. 31
February 12	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Jan. 31
March 11	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Feb. 29
April 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through March 31
May 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through April 30
May 6-10	Declaration of candidacy filing week
June 3	Begin filing C-3 reports weekly, each Monday, for deposits made during previous 7 days (Monday through Sunday)
June 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through May 31
June 24	Last day before primary election to change from mini to full reporting without special circumstances (See <u>WAC 390-</u>
Julie 24	<u>16-125</u> )
	21-day pre-primary C-4. Candidates appearing on the primary election ballot file a C-4 that covers the period June 1
	through July 15. So do committees supporting or opposing candidates.
July 16	
	Candidates not on the primary election ballot and committees only supporting or opposing general election ballot
	measures file monthly reports in June, July and August. These reports due on the 10th of the following month.
July 27 -	Campaign books open for public inspection
August 5	
July 30	7-day pre-primary C-4. Candidates appearing on the primary election ballot and committees participating in the
,	primary file a C-4 that covers the period July 16 through July 29
	Special reports due if candidate or committee receives contributions of \$1,500 or more from a single source, or
July 30 -	committee makes contributions of \$1,500 or more.
August 5	NOTE: December constitute authority to avocad applicable local avotate contribution limit
ALICHICT (	NOTE: Does not constitute authority to exceed applicable local or state contribution limit
AUGUST 6	PRIMARY ELECTION DAY
August 30	Last day before general election to change from mini to full reporting without special circumstances (See <u>WAC 390-</u>
	16-125)
	Post-primary C-4 due. Covers the period between July 30 and Aug. 31.
September 10	Candidates not on the primary election ballot and committees that did not participate in the primary file a report for
	the month of August
October 15	21-day pre-general C-4 report due - report for the period Sept. 1 through Oct. 14.

1. Special reports due if a candidate or political committee receives contributions of \$1,500 or more from a single source, or if a political committee makes a contribution of \$1,500 or more.

2. A candidate for statewide office may not accept contributions from a single source exceeding \$75,000 in the aggregate unless it is from the state committee of a bona fide major or minor political party.

3. A candidate for another office or a political committee may not receive contributions from a single source exceeding \$7,500 in the aggregate unless it is from the state committee of a bona fide major or minor political party. The exception is ballot measure committees, which may receive larger contributions.

October 26 -Campaign books open for public inspection November 4

October 29 7-day pre-general C-4 report due - report for the period Oct. 15 through Oct. 28.

November 4 Last Monday that weekly C-3 reports must be filed for general election

**GENERAL ELECTION DAY NOVEMBER 5** 

Post-general C-4 due that covers Oct. 29 through Nov. 30. File C-3s that have not been filed for any deposits made in December 10

November.

January 10, End of election cycle C-4 due that covers Dec. 1 through Dec. 31. File C-3s for any deposits made in December. 2025

October 15 -

November 4

# **Registration & Reporting Basics**

Candidate FAQ

**Training and Resources** 

Political Committee FAQ

#### **Registration & Reporting Basics**

Candidate Registration

Committee Registration

Choosing Mini or Full Reporting

**Bank Accounts** 

Ending a Campaign Before the Election is Held

Key Dates: 2024

**Electronic Reporting Tools** 

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**Expenditures & Debts** 

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# LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT (2024)



Contributions

**Expenditures** 

**Pledges** 

**Debts** 

**Loans** 

#### **Committee Overview**

Registered September 15, 2005 Democratic County Party Treasurer is Sonja Svenson

#### **Committee Contact**

- ◆ PO BOX 382

  CHEHALIS, WA 98532
- <u>lewiscodemocratswa@gmail.com</u>
- **J** 425-445-6032

#### **Financial Overview**

**\$3,349.14**Starting balance

**\$4,420.00**Contributions

+

**\$0.00**Loans

\$7,769.14

Total raised

\$8,411.38

\$0.00

\$0.00

Total spent

Pledges

Debt

## **Committee Reports and Forms**

Registration Form

Contributors and Vendors Map

# Made to committee for 2024

# **Contributions**

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

#### **Contributions made to committee for 2024**

Party

\$2,000.00

Other

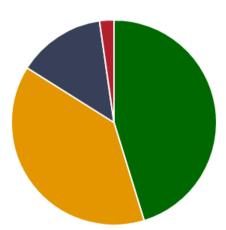
\$1,710.00

Individual

\$610.00

**Business** 

\$100.00



# Made by committee for 2024

# **Expenditures**

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

#### Expenditures made by candidate for 2024

Fundraising events and related...

\$5,005.00

Monetary contributions to PAC...

\$1,450.00

Design/graphic art, etc.

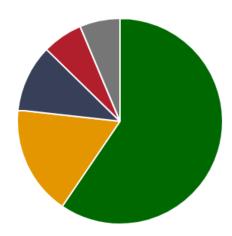
\$888.24

**Not Provided** 

\$534.14

Miscellaneous

\$534.00



# Made to committee

# **Loans**

See loans received, forgiven or paid by the campaign.

\$0.00

# Held by committee

# **Debts**

See the campaign's debt reporting history.

\$0.00

# **Campaign Finance Reports**

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

Show 25 ✓ entries

## Download 22 rows as CSV.

Period -	Report Number \$	Filed \$	Report \$	Form Type 💠	Election Year 💠
09/30/2024 - 09/30/2024	110250446	10/09/2024	<u>View Report</u>	C3	2024
08/19/2024 - 08/19/2024	110242596	09/06/2024	<u>View Report</u>	C3	2024
08/01/2024 - 08/31/2024	110242598	09/06/2024	View Report	C4	2024
07/01/2024 - 07/31/2024	110236083	08/05/2024	<u>View Report</u>	C4	2024
06/24/2024 - 06/24/2024	110227093	07/07/2024	View Report	C3	2024
06/01/2024 - 06/30/2024	110227096	07/07/2024	View Report	C4	2024
05/21/2024 - 05/21/2024	110235437	08/02/2024	View Report	C3	2024
05/21/2024 - 05/21/2024	110235438	08/02/2024	<u>View Report</u>	C3	2024
05/01/2024 - 05/31/2024	110219462	06/06/2024	View Report	C4	2024
05/01/2024 - 05/01/2024	110235439	08/02/2024	View Report	C3	2024
04/26/2024 - 04/26/2024	110211387	04/29/2024	View Report	C3	2024
04/01/2024 - 04/30/2024	110214291	05/10/2024	View Report	C4	2024
03/29/2024 - 03/29/2024	110207745	04/05/2024	View Report	C3	2024
03/22/2024 - 03/22/2024	110207746	04/05/2024	View Report	C3	2024
03/01/2024 - 03/31/2024	110207747	04/05/2024	View Report	C4	2024
02/27/2024 - 02/27/2024	110202983	03/02/2024	View Report	C3	2024

Period •	Report Number \$	Filed \$	Report \$	Form Type 💠	Election Year 💠	
02/02/2024 - 02/02/2024	110202984	03/02/2024	View Report	C3	2024	
02/01/2024 - 02/29/2024	110203445	03/05/2024	<u>View Report</u>	C4	2024	
01/26/2024 - 01/26/2024	110199707	02/04/2024	View Report	C3	2024	
01/05/2024 - 01/05/2024	<del>110199708</del> Amended by: 110202985	02/04/2024	<u>View Report</u>	C3	2024	
01/05/2024 - 01/05/2024	110202985	03/02/2024	View Report	C3 - Amended	2024	
01/01/2024 - 01/31/2024	110200792	02/10/2024	<u>View Report</u>	C4	2024	
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Complaint Against: LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT

**Submitted:** 10/23/24

Notice to Respondent by: 11/02/24 per WAC 390-37-050(1) 90 Day Initial Hearing Deadline: 1/21/25 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>

When a political committee makes an expenditure benefitting a candidate appearing on the general election ballot or donates to a committee whose spending benefits a candidate appearing on the general election ballot, the committee becomes obligated to file reports on the same schedule that those candidates must follow. <sup>3</sup>

#### **Reporting History of Respondent**

In the last several weeks, I filed a complaint against this respondent which demonstrated that they failed to submit the required C3/C4 reports that were due according to the reporting schedule they were obligated to follow because of their participation in the primary general election.

Despite the fact that the complaint I filed contained clear evidence that these respondents failed to file reports by the required deadlines, the agency staff dismissed these complaints with so-called "reminder" letters.

The use of reminder letter dismissals (as opposed to warning letter dismissals) to dismiss complaints which accurately identify violations is a cynical misuse of the staff's enforcement powers.

Let me be clear: I don't believe that this filer intentionally failed to file the required reports by the appropriate deadline. However, regardless of their intent, the failure to file reports by the appropriate deadline is a violation.

PDC staff have long known that there is an issue with committees in our state filing reports on the appropriate schedule. Rather than admit the existence of this problem and work with stakeholders

<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

<sup>&</sup>lt;sup>3</sup> See RCW 42.17A.235(2) and RCW 42.17A.005(38)

to come up with a solution that would solve this problem, the PDC staff have chosen to bury the problem under the rug with a mountain of "reminder" and "warning" letter dismissals.

This must change.

#### **Violations**

The above referenced respondent "participated" in the 2024 general election by virtue of the expenditures that they made. See URLs listed below and also RCW 42.17A.005(38). As such, this committee was obligated to file a 21-day C4 report by the 10/15/24 deadline.

The respondent failed to do so, despite having received a reminder letter only a few days prior. See attached.

###

Report evidencing LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON EXEMPT participation in general election: <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110219462">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110219462</a> (Damian Bean is on the general election ballot)

###

#### 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

#### **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