



State of Washington

PUBLIC DISCLOSURE COMMISSION

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March 19, 2018

Delivered electronically to Scott Holmes at "scottyholmes@hotmail.com"

Subject: Complaint filed against Mike Cooke, PDC Case 15112

Dear Mr. Holmes:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 10, 2017. Your complaint alleged that Mike Cooke, an employee of the Clark County Sheriff's Office, may have violated RCW 42.17A.555 by using the facilities of the Clark County Sheriff's Office to support Chuck Atkins, a candidate seeking the office of Clark County Sheriff in 2014.

PDC staff reviewed your allegations and as a result of staff's initial review, we found the following:

- On July 10, 2013, Chuck Atkins filed a Candidate Registration (C-1 report) with the PDC declaring his candidacy for the office of Clark County Sheriff in 2014. The C-1 report filed by Chuck Atkins listed Scott Wilcox as Campaign Manager; John Chapman as the Campaign Treasurer; and Mike Cooke as Communications Manager.
- Mr. Cooke stated in his response letter that Mr. Wilcox planned all of the Campaign meetings which usually occurred at his office at his place of employment, which is a private business, and he also coordinated the Campaign events which were held at private locations. He stated the Campaign meetings and events were scheduled for non-work times, and that he was not on-duty when he attended or participated as Communications Manager, and later as a volunteer. He added that on several occasions he was unable to attend the scheduled Campaign meetings since he was working.
- Mr. Cooke stated that all of the Chuck Atkins campaign materials were stored at the "private residences of campaign volunteers" and that he stored some materials at his home in his garage. He stated the majority of the Campaign materials were stored at Mr. Atkins residence, and that at no time were campaign materials ever stored at the Clark County Sheriff's Office or any of the facilities.
- Mr. Cooke stated the photographs of campaign materials you included as part of your complaint had been posted on the campaign's Facebook page, and that none of the photographs posted on the page included any public facilities being used. He stated:

1. The photograph of the Chuck Atkins sticker on a car window was taken by him and the vehicle featured was his personal vehicle.
 2. The photograph of the Chuck Atkins coffee mug in front of a cactus was taken by Mr. Wilcox while he was on a business trip in Arizona.
 3. The other photographs were taken by various individuals that were in attendance at various Campaign-related events, and none of the photographs had been at the Clark County Sheriff's Office, or using Sheriff's office resources.
- Mr. Cooke also included an email dated February 14, 2014, that he attached to his response which was addressed to the Chuck Atkins Campaign and Mr. Wilcox. In the email, Mr. Cooke informed them that he was having difficulty in finding the time to act as Communications Manager while also working for the Sheriff's office, so he would need to step down from that role for the Campaign.
 - The email went on to state "As you know I can't do campaign work while on the clock for the county" and that the Campaign should list Mr. Wilcox "as the contact person and let Mr. Wilcox field those calls related to the Campaign. Mr. Cooke stated that he could do the work on the Campaign Facebook page, and the design work on the promotional products, since he was already doing that in the evenings anyway on his own time.

Based on these findings, staff has determined that in this instance, there is no evidence that supports a finding of a material violation warranting further investigation. The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Kurt Young by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

/s _____
Kurt Young
PDC Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Mike Cooke