

## Complaint: Lack of Reported Campaign Expenditures by Clark County Republican Party

**Chuck Green** reported 2 days ago (Sun, 28 Aug at 8:33 AM) via Email

To: pdc@pdc.wa.gov

Cc: peryliz@comcast.net

Dear Public Disclosure Commission:

On behalf of Elizabeth Campbell, I am submitting for Public Disclosure Commission review a complaint against the Clark County Republican Party. We have evidence of at least three campaign mailers, supporting certain Republican candidates but also opposing certain Republican candidates, which were mailed prior to the August 2, 2016 Primary election and were noted as being paid for by the Clark County Republican Party (CCRP).

However, a search of PDC reports through August 27, 2016 indicate that the CCRP has reported no expenditures since May 2016, and there is no record of any such expenditures being reported for the development, printing, and postage to mail out these flyers. They are attached to the complaint as exhibits, as is an article from the local newspaper The Columbian from August 27, 2016 which refers to the flyers in question.

You will find three files attached:

- 1) A pdf of the completed complaint form with contact information for the proponents and respondents;
- 2) A pdf of the five (5) exhibits referenced in the complaint
- 3) A scan of the signed Oath statement of Elizabeth Campbell.

Our contact information as well as that of the Respondent are included in the complaint.

Please let us know if you have any questions or need of clarification.

Sincerely,

-Chuck Green

360-449-2132

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**3 Attachments**



## WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION COMPLAINT FORM

(See instructions on the last page.)

### Description of Complaint

#### 1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

*Example #1: Joe Public, Mayor of My Town,*

*123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown*

*Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,*

*Phone: 555-123-4567, Email: pag@pag.org, Website: [www.PAGwashington.org](http://www.PAGwashington.org)*

Clark County Republican Party

Kenny Smith, Chair

20400 NE 225<sup>th</sup> Avenue

Brush Prairie, WA 98606

PDC report contact email: JEANNEH@TDS.NET

Smith phone: 360-521-8565

#### 2. ALLEGED VIOLATIONS:

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. (Note that the RCW 42.17 citation applies to conduct before 2012 and the RCW 42.17A citation applies to conduct on or after January 1, 2012.)

On at least three occasions prior to the August 2, 2016 Primary election, the Clark County Republican Party printed and mailed thousands of mailers opposing Republican candidates while supporting other Republican candidates. These were mailed to many addresses in Clark County Council District 3 (voters registered: 62,424) and District 4 (voters registered: 70,033); and Legislative District 18 (voters registered: 92,113). The mailers indicate they were paid for by the Clark County Republican Party (CCRP). However, the Public Disclosure Commission report for the CCRP as of August 27, 2016 do not report any expenditures for any of these mailers.

This is a violation of RCW 42.17A.235, Reporting of contributions and expenditures, and possibly RCW 42.17A.260 Special reports—Political advertising if the PDC chooses to consider these Independent Expenditures by the Clark County Republican Central Committee.

These were sent to thousands of households and were not just limited to those registered as Republicans. They were received between July 15 and 24, 2016 which implies there would have been expenditures in June and earlier in July for graphics development and printing, and there would have been expenditures in mid-July for postage.

## **Evidence and Witnesses**

### **3. EVIDENCE:**

**List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.**

*Example: Emails between Joe public and Candidate X, attached OR*

*Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.*

Exhibits 1-3 are the mailers in question, each highlighting where they indicated they were paid for by the Clark County Republican Party. Note Exhibit 1 appears to be a mailer in support of candidate Liz Pike; however, there is no identifying information as to who paid for the flyer and there are elements and formatting that are the same content as those paid for the Clark County Republican Party, as noted in Exhibits 2 and 3.

Exhibit 4 shows the Clark County Republican Party Central Committee PDC reporting as of August 27, 2016 which shows no reported expenditures since May 31, 2016, and no reported expenditures specific to the mailers in question.

Exhibit 5 is an on-line Columbian article referencing the Clark County Republican Party's involvement in these mailers.

### **4. WITNESSES:**

**List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.**

*Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.*

Chuck Green  
2705 NE 170<sup>th</sup> Street  
Ridgefield, WA 98642  
Chuck.green1407@gmail.com  
Phone: 360-449-2132

## Certification

### In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.
- Unless otherwise noted, I agree that PDC may use email instead of U.S. mail for all written correspondence about this complaint.

**E-mail address:** perryliz@comcast.net

**Your name (print or type):**Elizabeth Campbell

**Street address:** 13504 NW 47th Ave

**City, state and zip code:** Vancouver, WA 98685

**Telephone number (including area code):** 360-523-2267

**Oath**

**Required for all complaints filed with the Public Disclosure Commission:**

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.\*

**Your signature** \_\_\_\_\_

**Date signed** \_\_\_\_\_

**Place signed (city and county)**

\_\_\_\_\_  
**City**

\_\_\_\_\_  
**County**

**Attachments**

**Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.**

*\*RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."*

**Washington State Public Disclosure Commission**  
**Instructions for Filing a Formal Complaint**

➤ **When to use the formal complaint form:**

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at [www.pdc.wa.gov](http://www.pdc.wa.gov).

If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

➤ **How to submit your complaint form to the PDC:**

- Complete all sections. If you do not have some information, please write “unknown” instead of leaving a blank space.
- Attach copies of any evidence you have - we’ll contact you if we need originals.
- Sign the oath.
- Mail, fax, or email your complaint and all attachments to the PDC.

➤ **If you have more questions:**

If you have more questions about filing a complaint, see the “Frequently Asked Questions about Filing a Complaint” guide available on the PDC’s website at [www.pdc.wa.gov](http://www.pdc.wa.gov) under “Enforcement and Compliance.” You may also contact the PDC directly.

**PDC Contact Information**

**MAILING ADDRESS:** Washington State Public Disclosure Commission  
711 Capitol Way, Room 206  
PO Box 40908  
Olympia, WA 98504-0908

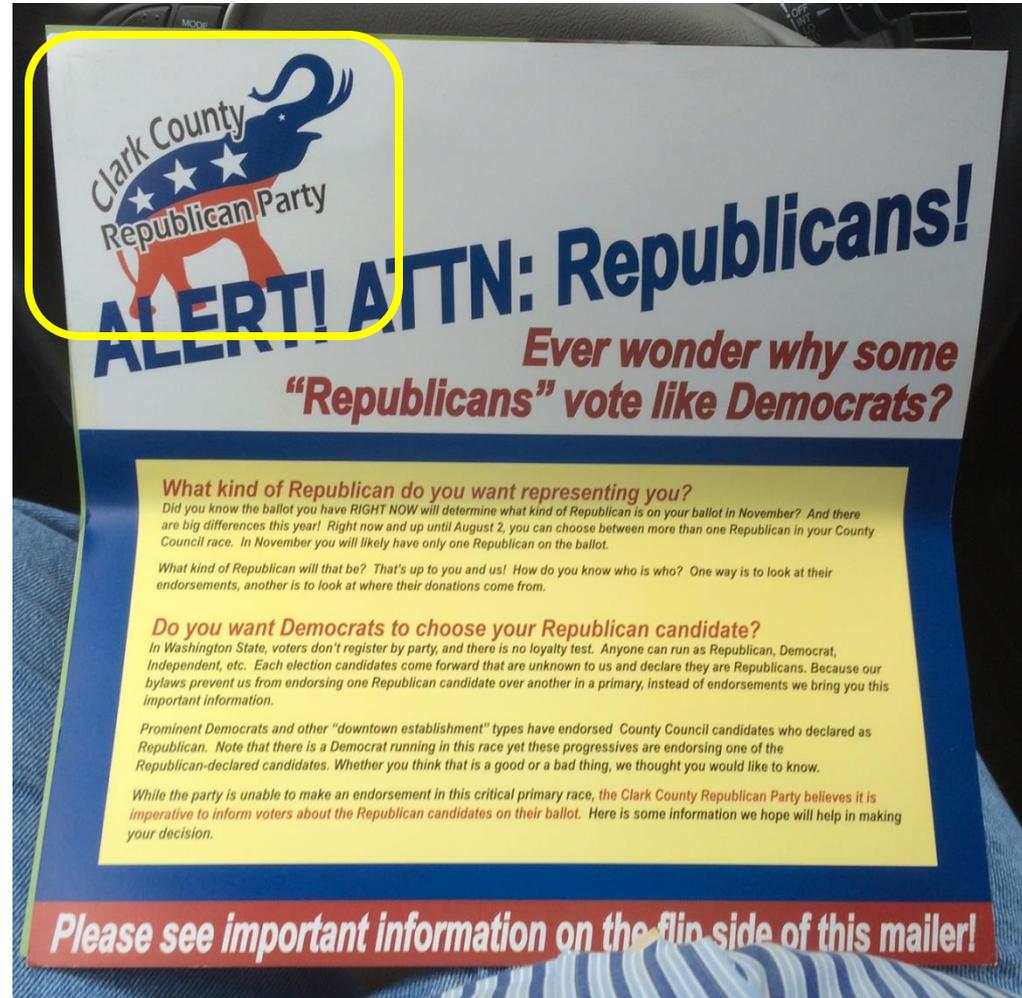
**EMAIL ADDRESS:** [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

**PHONE:** 1-877-601-2828 (toll free)

**FAX:** (360) 753-1112

**HOURS:** Monday-Friday, 8:00 a.m. – 5:00 p.m., closed on state holidays.

# Exhibit 1: Clark County Republican Party Pike Mailer (July 2016)



Note information and format matches information on Exhibits 2 and 3

# Exhibit 2: Clark County Republican Party Pro-Quiring Mailer (July 2016)

**A 2016 Primary Election & Information Alert**  
No candidate authorized this ad.  
It is paid for by the Clark County Republican Party  
PO Box 205  
Vancouver, WA 98666

PRSR STD  
US Postage  
PAID  
Mailed from  
98642  
PERMIT No. 94

**If you want quality candidates on  
your November ballot, you must vote  
for them by August 2nd!**

47P2\*\*\*\*\*ECRWSH\*\*R007  
7004 W Loop  
Washougal, WA 98671-8603

## 2016 Primary Election Alert!

Jennifer McDaniel

### Why would LIBERAL Democrats endorse Jennifer McDaniel for the Clark County Council?

- Chuck Green** - The Democrat for county council we defeated in the last election.
- Deanna Pauli-Hammond** - Former chair of the Clark County Democratic Party.
- Nan Henrikson** - Democrat and Chair of Freeholders who gave us that awful charter!
- Betty Sue Morris** - Former Democratic Commissioner.
- Jack Burkman** - Dedicated Liberal, Vancouver City Councilmember.
- Larry Smith** - Consistent Liberal, Vancouver City Councilmember.

### Could it be they expect McDaniel to vote like a Democrat?

Eileen Quiring

**In contrast, Eileen Quiring chose as her campaign slogan "A Conservative We Can Trust," and most of her donations come from grassroots Republican activists.**

# Exhibit 3: Clark County Republican Party Pro-Madore Mailer (July 2016)

**A 2016 Primary Election & Information Alert**  
No candidate authorized this ad.  
It is paid for by the Clark County Republican Party  
PO Box 205  
Vancouver, WA 98666

PRSRT STD  
US Postage  
PAID  
Mailed from  
98642  
PERMIT No. 94

**If you want quality candidates on your November ballot, you must vote for them by August 2nd!**

## 2016 Primary Election Alert!

John Blom

### Why would LIBERAL Democrats endorse John Blom for the Clark County Council?

**Chuck Green** - The Democrat for county council we defeated in the last election.  
**Craig Pridemore** - The Democrat for county commissioner we defeated in 2014.  
**Deanna Pauli-Hammond** - Former chair of the Clark County Democratic Party.  
**Nan Henrickson** - Democrat and Chair of Freeholders who gave us that awful charter!  
**Betty Sue Morris** - Former Democratic Commissioner.  
**Jack Burkman** - Dedicated Liberal, Vancouver City Councilmember.  
**Larry Smith** - Consistent Liberal, Vancouver City Councilmember.

### Could it be they expect Blom to vote like a Democrat?

David Madore

### In contrast, David Madore's endorsements and volunteers include vast numbers of grassroots conservative Republicans.

If you appreciate information like this, please donate online at [www.clarkrepublicans.org](http://www.clarkrepublicans.org) - And vote by August 2nd!

# ALERT! ATTN: Republicans!

**Ever wonder why some "Republicans" vote like Democrats?**

#### What kind of Republican do you want representing you?

Did you know the ballot you have RIGHT NOW will determine what kind of Republican is on your ballot in November? And there are big differences this year! Right now and up until August 2, you can choose between more than one Republican in your County Council race. In November you will likely have only one Republican on the ballot.

What kind of Republican will that be? That's up to you and us! How do you know who is who? One way is to look at their endorsements, another is to look at where their donations come from.

#### Do you want Democrats to choose your Republican candidate?

In Washington State, voters don't register by party, and there is no loyalty test. Anyone can run as Republican, Democrat, Independent, etc. Each election candidates come forward that are unknown to us and declare they are Republicans. Because our bylaws prevent us from endorsing one Republican candidate over another in a primary, instead of endorsements we bring you this important information.

Prominent Democrats and other "downtown establishment" types have endorsed County Council candidates who declared as Republican. Note that there is a Democrat running in this race yet these progressives are endorsing one of the Republican-declared candidates. Whether you think that is a good or a bad thing, we thought you would like to know.

While the party is unable to make an endorsement in this critical primary race, the Clark County Republican Party believes it is imperative to inform voters about the Republican candidates on their ballot. Here is some information we hope will help in making your decision.

### Please see important information on the flip side of this mailer!

Note: this was received by a Democratic household. Reverse side of Exhibits 2 and 3 matches information on Exhibit 1

# Exhibit 4: CCRP Expenditures Reported to PDC as of 8/27/16



Election Totals ▼ Candidates ▼ **Committees ▼** Independent Expenditures ▼ Lobbying ▼ Advanced ▼ PDC Home

Continuing | Single Year | Initiative | Caucus | **Party ▼** |

- [Cash Contributions](#)
- [Inkind Contributions](#)
- **[Expenditures](#)**

Expenditures for: CLARK CO REPUB CENT COMM NON EXEMPT

[Contact Information](#)

[C1PC Report](#)

Total Raised: \$62,776.68 Total Spent: \$47,189.68

(Detailed Expenditures (Inkind

\$56,641.24 \$0.00

NOTE: Click on a column header to sort by that column, or click on the icon to filter your results



Drag a column header and drop it here to group by that column

REPORT	NAME	DATE	AMOUNT	CITY	STATE	ZIP	DESCRIPTION
<a href="#">Report</a>	FIVE 9	5/31/2016	\$184.80	SAN RAMON	CA	94583	OFFICE TELEPHONE
<a href="#">Report</a>	COMCAST	5/27/2016	\$119.96	VANCOUVER	WA	98660	OFFICE TELEPHONE
<a href="#">Report</a>	GREATERGIVING	5/27/2016	\$56.38	BEAVERTON	OR	97006	CC FEES
<a href="#">Report</a>	OFFICE DEPOT	5/24/2016	\$82.37	VANCOUVER	WA	98665	PREPARATION FOR LDD
<a href="#">Report</a>	USPS	5/19/2016	\$141.00	VANCOUVER	WA	98665	POSTAGE
<a href="#">Report</a>	GREATERGIVING	5/13/2016	\$73.65	BEAVERTON	OR	97006	CC FEES
<a href="#">Report</a>	CLARK PUD	5/4/2016	\$117.86	VANCOUVER	WA	98668	OFFICE UTILITIES
<a href="#">Report</a>	HOME DEPOT	5/3/2016	\$154.71	VANCOUVER	WA	98665	YARD SIGNS
<a href="#">Report</a>	LO HATCH	5/1/2016	\$1,400.00	BATTLGROUN	WA	98004	OFFICE RENT
<a href="#">Report</a>	EXPENSES OF \$50 OR LESS	5/1/2016	\$346.54				
<a href="#">Report</a>	FIVE 9	4/29/2016	\$184.78	SAN RAMON	CA	94583	OFFICE TELEPHONE
<a href="#">Report</a>	COMCAST	4/27/2016	\$119.96	VANCOUVER	WA	98660	OFFICE PHONE
<a href="#">Report</a>	CLARK COUNTY FAIRGROUNDS	4/26/2016	\$1,200.00	RIDGEFIELD	WA	98642	COUNTY FAIR
<a href="#">Report</a>	DELAVAR KATJA	4/19/2016	\$110.79	WASHOUGAL	WA	98671	REIMB COUNTY CONVENTION
<a href="#">Report</a>	NW NATURALS	4/12/2016	\$80.24	PORTLAND	OR	97228	OFFICE UTILITIES

1 2 3 4 5 6 7

Displaying items 1 - 15 of 99

Sorted by date, latest date first:

[http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUIJDIDY2Ng%3D%3D%3D%3D&year=2016&type=party\\_county](http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUIJDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county)

# Exhibit 5: Columbian Article 8/27/16

## County Republicans to consider neutrality resolution

Party meeting set for Saturday

By [Lauren Dake](#), Columbian Political Writer

Published: August 26, 2016, 10:00 AM



The Clark County Republican Party made it clear on the colorful campaign advertisement it mailed: The organization cannot make endorsements in a primary race.

But flip the mailer over, and some would argue a different message was clear.

"Why would liberal Democrats endorse Jennifer McDaniel for the Clark County Council?" the mailer read. Later, the flier answered its own question with another: "Could it be they expect McDaniel to vote like a Democrat?"

Below, there's a head shot of candidate Eileen Quiring, noting she has chosen "a conservative we can trust" as her campaign slogan and that most of her donations came from "grass roots Republican activists."

The two Republican candidates and the mailer, paid for by the Clark County Republican Party, are illustrative of a long-standing war that's being waged within the local party ranks. In 2012, a push to elect anti-establishment Republicans or "grass roots Republican activists" to GOP leadership successfully worked to oust the old guard.

Now, some are hoping after a Dec. 3 election among party officers, the local GOP's pendulum could swing the other direction.

Clark County Republican Chair Kenny Smith, however, doesn't foresee any massive shake-up in the party's future.

"I hope there's not a shift back to top-down," he said. "I hope it remains a grass-roots organization and it's my anticipation that it will."

But, Smith added, "This is the proper place for the battle to occur. We've seen a lot of improper ways people have tried to damage the party over the last few years. The proper way is the every other year organizing of the precinct committee officers."

First, on Saturday, the party's rank-and-file members are scheduled to weigh in on the role the party plays when it comes to contested primaries.

Trevor Winton, a precinct committee officer, said the mailer was "effectively taking a position," as an endorsement would.

Quiring ended up receiving 2,901 more votes than McDaniel in the primary, and will face Democrat Roman Battan in November.

Winton plans to present a resolution on Saturday at this weekend's Clark County PCO meeting.

"I want to create clarity about what we're doing, so we don't have these arguments," he said. "We don't want to argue about what's fair and what's not fair, we lose the ability to focus on what's important, which is advancing our core principles."

If adopted, the resolution would call for the Clark County Republican Party's neutrality when it comes to Republican candidates in a contested primary. That would include sharing voter database information or using funds to promote a particular candidate.

"The bylaws, at least the spirit of the bylaws, (say) there should be no taking of a position," Winton said.

**Oath**

**Required for all complaints filed with the Public Disclosure Commission:**

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.\*

Your signature Elizabeth Campbell

Date signed 8-27-2016

Place signed (city and county)

Vancouver City Clark County

**Attachments**

Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

*\*RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."*