

Senate Republican Campaign Committee

To Whom It May Concern --

It has come to our attention that State Senator John McCoy, his campaign committee "Re-Elect John McCoy", and his treasurer Richard Ledford, have habitually and willfully committed frequent and multiple violations of RCW 42.17A. Additionally, we have reason to believe that other violations of this chapter have occurred beyond what has been identified below.

Summary of Violations

State law requires that candidates and committees file frequent, accurate, reports of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s).

Unfortunately, the 2018 Senate re-election campaign for John McCoy has failed to abide by this requirement.

Over a period of 3 years, McCoy waited months and sometimes years to disclose nearly \$40,000 that he had received in campaign contributions from unions, corporations, and other special interest groups. In many instances, McCoy's campaign failed to timely deposit campaign contributions it had received, in violation of state law. Additionally, he failed to disclose numerous expenditures in a timely basis.

See Attachment A (Late Filed Reports) and Attachment B (Individual Late Reported Contributions).

A few points to note:

- McCoy accepted tens of thousands of dollars from unions, corporations, and other special interest groups that went undisclosed for years.
- Many contributions should have been disclosed in advance of the 2016, 2017, and 2018 legislative sessions, but were not disclosed until after the 2018 session.
- McCoy served on the committee (State Governmental Operations) that has oversight and subject matter jurisdiction over the Public Disclosure Commission and campaign finance regulations.
- John McCoy has been an elected official and candidate (subject to PDC disclosure requirements) from 2002 to 2018, over 16 years.
- In total, McCoy late reported 79 individual contributions valued at \$39,276.93. Cumulatively, the individual contributions were reported 25916 days late.

Conclusion

RCW 42.17A.001 states that:

"...political campaign and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is to be avoided..."

"...the public's right to know of the financing of political campaigns and lobbying and the financial affairs of elected officials and candidates far outweighs any right that these matters remain secret and private..."

"...the people have the right to expect from their elected representatives at all levels of government the utmost of integrity, honesty, and fairness in their dealings..."

Given the sheer volume of undisclosed and late-reported contributions received by Senator McCoy over the last 3 years, this case must be referred to the Attorney General's office for prosecution.

The maximum penalty the Public Disclosure Commission is able to levy in this case is insufficient to address the severity of the violation. Additionally, given the speed of the PDC's enforcement process, it is unlikely that they would be able to adjudicate this issue prior to the 2018 elections being held.

Please notify me in writing if you require any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin Matheson", written in a cursive style.

Justin Matheson
Executive Director