

Complaint Description

[Glen Morgan](#) (Tue, 16 Jul 2019 at 1:54 PM)

To whom it may concern,

It has come to my attention that Artur Wojnowski who is a candidate for the Port Angeles City Council, position #5, has violated Washington State's campaign finance laws (**RCW 42.17A**).

1) Actively campaigning, before filing "statement of organization" (C1). (Violation of RCW 42.17a.210(1) and RCW 42.17A.205)

State law requires each candidate, within 2 weeks after becoming a candidate, to file a statement of organization (C1). This candidate failed to do so within two weeks of filing week (May 13th thru 17th 2019). As of the date of this complaint he has still not filed his C1, which is far beyond the 2 weeks required in state law. This is a clear, unambiguous violation of state law. The primary election itself is only a few days away now and ballots are mailed shortly.

By violating **RCW 42.17a.210** and **RCW 41.17A.205** --failing to declare this candidate's candidacy (C1) the voters also don't know who is serving as this candidate's treasurer, who the officers of this candidate's political committee are, where this candidate is banking the campaign funds for this political campaign, what address to use when inspecting the campaign books, etc. For proof of this active campaign, please see the attached screen shot of this candidate's voter's guide statement in the Clallam Voters Guide.

It is worthwhile to point out to the PDC that when a crowded primary for elected office like this one for the Port Angeles City Council position #5 contains three candidates for office, and when none of these candidates actually follow any of the campaign finance laws, then a variety of incentives against transparency are created, encouraged, and rewarded. Not only is the primary election outcome in this election race certain to result in electing at least two candidates who have never followed the campaign disclosure rules, but their success will certainly encourage others to repeat their failure to follow the law in the future with no consequences (and in fact electoral success) in the future. This is far more than a minor technical mistake – it is another example where electoral outcomes – potentially very significant for the local community will certainly occur, in part due to lawbreaking by the very candidates (in this case – every one of them) who should be at least pretending to follow that same law.

I will also add the observation that this candidate is experienced and has run for office before. In 2017, this candidate did file both a C1 (see attached) and F1 for that campaign for Port Angeles City Council (Position 3) , so it is mystifying as to why he chose to completely ignore the campaign finance laws this time.

2) Failure to file Personal Financial Disclosure Forms (F-1) (Violation of RCW 42.17A.700)

In addition to not registering their campaign with the PDC, this candidate has also failed to file his personal financial disclosure documents in a timely manner, although he at least filed them on June 26, 2019, which was two weeks late.

3). Failure to file Contribution or Expenditure Reports (Violation of RCW 42.17A.235)

This candidate has also failed to file any contribution or expenditure reports from his campaign. It should be noted that this failure to comply also includes a total absence of any reported information to the PDC for the public to see anything about this campaign and how it has spent the resources on this election campaign. Even if this campaign claims to be filing a "mini-reporting" campaign, their failure to provide an address to review their books means that it is impossible for the public to review the information about who is funding this campaign and how funds were spent to support this campaign.

While I have publicly advocated for many years on the need for more flexibility for the PDC to address and resolve minor technical mistakes, and this is why I was supportive of many of 2018's HB 2938 reforms, there still must be some clear penalty assigned to candidates who choose to completely ignore and mock **EVERY SINGLE** campaign finance rule that exists. In these cases, a slap on the wrist and a "naughty, naughty, naughty" statement is probably not much of a deterrent. Ghost campaigns like this one should be held accountable for a complete unwillingness to follow the state's campaign finance laws.

In this case, the candidate is an experienced veteran from a 2017 campaign where he at least partly complied with the campaign finance laws by timely filing both a C1 and F1.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The campaign has a right to know who funds a political campaign, who the officers of that campaign may be, who the treasurer might be, how that campaign spends their campaign funds (even if it is just their own), and where one would be able to review the campaign books, which can't be done when the candidate runs a "ghost" campaign like this one. Total and complete lack of transparency or even to make an effort to pretend to be transparent for the voters. At least this candidate submitted his financial disclosure form - although it was two weeks late.

List of attached evidence or contact information where evidence may be found.

attached as referenced in complaint

List of potential witnesses with contact information to reach them.

The candidate, his treasurer, and any officers associated with his campaign

Complaint Certification:

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.