



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

Clark County Councilor David Madore

Public Service Center

1300 Franklin Street

Vancouver, WA 98660

david.madore@clark.wa.gov

Council phone: 360-397-2232

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 two occasions, I believe Councilor Madore violated RCW42.17A.555, Use of public office or agency facilities in campaigns. Since 2014, he has had exclusive access to posting documents on an official Clark County website, called the "C-Grid", found here: <https://www.clark.wa.gov/c-grid>. There were no county studies or any other governmental reasons to post these documents to the county's website other than to support his campaigning Facebook posts. There were no items on the County Council's hearing agendas nor on their weekly Board Time agendas that remotely referred to items for which these documents would be needed.

Councilor Madore's ability to personally post documents to that website was confirmed in an article in the Columbian, dated February 3, 2016, which can be found here: <http://www.columbian.com/news/2016/feb/03/madore-criticized-over-page-on-county-website/>.

On two occasions, Councilor Madore posted materials on the County C-Grid website and then referenced those documents on posts via his public Facebook page, <https://www.facebook.com/DavidMadorePublic/?fref=ts>. These two posts, in particular, are:

1) October 1, 2015, posted about Clark County Chair Write-in candidate Liz Pike, whom Councilor Madore supported, uploaded to the county website a letter written to her by Jerry Olson, and referenced that letter in his Facebook post. See attached, Exhibit 1 and References A and B. This letter was from a citizen to State Representative Liz Pike, and was not cc'd to anyone at the county. There was no county business on the dockets at the time. Reference B shows the referenced Pike letter from Olson.

2) September 29, 2015, Councilor Madore made a campaign post against Marc Boldt, a candidate for Clark County Chair who Councilor Madore opposed (and who beat out Councilor Madore in the August 2015 primary for the same seat). Councilor Madore uploaded the referenced development agreement to the county's C-Grid website and then proceeded to reference that document in his Facebook post. See attached, Exhibit 2 and Reference C.

In both cases, Councilor Madore used public resources, the county's C-Grid website, to campaign for a candidate whom he favored, and against a candidate for whom he was opposed.

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.

See attached file, Exhibit 1 with References A and B, and Exhibit 2 with Reference C. Documents uploaded to the public Clark County C-Grid website can be found here: <https://www.clark.wa.gov/c-grid>.

Exhibit 3 consists of documentation from Councilor Madore's Facebook page confirming his support of candidate Liz Pike.

Exhibit 4 shows Madore's contributions to the Liz Pike County Chair campaign, further showing his campaign support for Liz Pike.

Exhibit 5 contains County Council hearing agendas and Board Time agendas for the weeks before, during and after the posts of Exhibits 1 and 2. These demonstrate that no Clark County action or consideration was being taken relevant to these two documents at the time Councilor Madore posted them to the county's C-Grid website.

Exhibit 6 is the on-line Columbian article referenced above.

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.

Deborah Nelson
4905 NE 47th Avenue
Vancouver WA 98661
Just-solutions@comcast.net

Terry Conner
17414 SE 19th St
Vancouver, WA 98683
terryconner@fisherslandinghypnotherapy.com

Jackie Lane
24203 ne 59th ave
Battle Ground, WA 98604
360 687-0609
jmlane@msn.com

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: sjclgreen@yahoo.com

Your name (print or type):Charles Green

Street address: 2705 NE 170th Street

City, state and zip code: Ridgefield, WA 98642

Telephone number (including area code): 360-449-2132

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.

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 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

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.