



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

July 29, 2019

Delivered electronically to "white4council@gmail.com"

Subject: PDC Case 52310

Dear Diana K. White:

Below is a copy of an electronic letter sent to Nikolas Battle and Tiffany Chang concerning complaints filed with the Public Disclosure Commission (PDC).

As noted below to Nikolas Battle and Tiffany Chang, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely and accurately reporting contributions, expenditures and in-kind loans, and providing detailed descriptions of campaign expenditures on C-4 Reports and related Schedules. PDC staff expects that you will timely and accurately file all PDC reports in future years in accordance with PDC laws and rules.

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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



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July 29, 2019

Delivered electronically to "emailnikob@gmail.com" and "twilk104@gmail.com"

Subject: Complaint regarding Diana K. White, PDC Case 52310

Dear Nikolas Battle and Tiffany Chang:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on May 28, 2019 and June 4, 2019. Your complaints alleged that Diana White (the "Respondent") may have violated RCW 42.17A.235 & .240 for failure to timely and accurately report contributions and expenditures. The complaints specifically alleged that the Respondent failed to report expenditures related to her campaign kick-off event, printed materials, buttons, rally signs, and website.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; and the applicable PDC reports filed by Respondent to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The Respondent is a candidate for Edmonds City Council. The Respondent was also a candidate in 2011 and 2015. Although not a first-time candidate, the Respondent has limited filing experience due to the small size of her previous campaigns. The Respondent's current campaign is relatively small and unsophisticated.
- The Respondent's reporting history with the PDC shows that two of its C-4 reports (receipts & expenditures) were filed 27 - 57 days late and three C-3 reports (cash receipts & monetary contributions) were filed 3-56 days late.
- During this investigation, it was discovered that the Respondent's April and May C-4 reports did not contain adequate descriptions, giving the appearance that the campaign failed to report some expenditures to the PDC. An in-kind loan from the Respondent to the campaign for its kickoff event was also reported incorrectly.
- Upon being notified of the above-mentioned issues on June 19, 2019, the Respondent quickly replied and made a good-faith effort to resolve the its good-faith omissions by amending the campaign's C-4 reports. The campaign worked diligently with PDC staff to amend multiple reports.
- The following expenditures, which were alleged to have been unreported, are now reported correctly:

- In-kind loan from Respondent to campaign for expenditures related to 4/30/19 campaign kick-off event at Las Brisas (report #100919252)
- Campaign's 5/29/19 repayment of loan to Respondent for kick-off event (report #100915573)
- Web site set up & domain names purchased from BizMktCom on 5/15/19 (report #100915573)
- Yard signs, campaign buttons & donation envelopes purchased from Trade Printery on 5/29/19 (report #100915573)
- Business cards, Thank You notes & envelopes purchased from Branding Iron on 5/29/19 (report #100915573)
- Yard sign design & button purchased from Soundview Design on 6/26/19 (report #100917396)

Based on these findings, staff has determined that, in this instance, failure to 1) timely report contributions and expenditures; and 2) accurately report an in-kind loan and expenditure descriptions does not amount to a violation warranting further investigation.

PDC staff is reminding the Respondent about the importance of timely and accurately reporting contributions, expenditures and in-kind loans and providing detailed expenditure descriptions on all future PDC reports.

The Respondent made minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of these errors, the Respondent timely amended the campaign's reports, making the necessary technical corrections.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov

Sincerely,

/s _____
 Tabatha Blacksmith
 Compliance Coordinator

Endorsed by,

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

cc: Diana White