



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

September 26, 2019

Delivered electronically to "erinn@erinnjhale.com"

Subject: PDC Case 54918

Dear Erinn Howell:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Glen Morgan, 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.

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 pdc@pdc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

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



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September 26, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Erinn Howell, PDC Case 54918

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 15, 2019. Your complaint alleged that Erinn Howell (the "Respondent") may have violated RCW 42.17A.205, .700 and .235 by failing to timely file a Candidate Registration (C-1 report) and a Personal Financial Affairs Statement (F-1 report) with the PDC within two weeks of becoming a candidate and timely report contributions & expenditures.

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 first-time candidate running for Bremerton City Council, District 6 who filed as a candidate with the Kitsap County Auditor's Office on May 15, 2019.
- Candidates are required to register with the PDC within two weeks of becoming a "candidate," as defined in RCW 42.17A.005(9) and WAC 390-05-200. Pursuant to RCW 42.17A.205, candidate committees are required to register with the PDC within two weeks of 1) being organized; or 2) first having the expectation of receiving contributions or making expenditures, whichever comes first. The Candidate Registration (C-1 report) serves the dual purpose of registering both the candidate and the candidate's committee. The C-1 report for 2019 candidates was due no later than June 1, 2019.
- Based on the date her declaration of candidacy was filed with the Kitsap County Auditor's Office, the Respondent's C-1 report was due to be filed with the PDC no later than May 29, 2019.
- Pursuant to RCW 42.17A.700, every candidate is required to file a statement of financial affairs with the PDC, certifying financial activity for the preceding twelve months, within two weeks of becoming a candidate. The 2019 F-1 report, certifying financial activity for 2018, was due for candidates no later than June 1, 2019.
- The Respondent filed a Personal Financial Affairs Statement (F-1 report) with the PDC on July 12, 2019 but technical issues prevented it from appearing in the PDC's system until September 9, 2019.

- On July 23, 2019, the Respondent responded, by email and telephone, to the complaint allegations and indicated that noncompliance was due to a misunderstanding and lack of experience. The Respondent also stated that a family illness had diverted her attention from the campaign.
- The Respondent filed a Candidate Registration (C-1 report) with the PDC on September 20, 2019 and selected the mini-reporting option. Mini-reporters are not required to submit C-3 and C-4 reports to the PDC disclosing campaign contributions and expenditures.
- On September 20, 2019, the Respondent entered into a Statement of Understanding with the PDC, acknowledging her failure to timely file the C-1 report, and paid a \$100 penalty.

Based on these findings, staff has determined that, in this instance, failure to timely file the Candidate Registration (C-1) and Personal Statement of Financial Affairs (F-1) reports does not amount to a violation warranting further investigation.

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: Erinn Howell