



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

August 28, 2019

Delivered electronically to "[lisathomasforcitycouncil@gmail.com](mailto:lisathomasforcitycouncil@gmail.com)"

Subject: PDC Case 54966

Dear Lisa Thomas:

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

As noted below to Michele Levenite, 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 filing a Personal Financial Affairs Statement (F-1 report) within two weeks of declaring candidacy and timely & accurately reporting contributions & expenditures, including in-kind contributions (e.g. purchases made by others on your behalf), in-kind loans (e.g. purchases made on behalf of the campaign using personal funds), and any expenditures made with in-kind loans. PDC staff expects that you will timely & accurately file all required reports and disclose all contributions & expenditures 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 [pdc@pdc.wa.gov](mailto: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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August 28, 2019

Delivered electronically to "[mlevenit@msn.com](mailto:mlevenit@msn.com)"

Subject: Complaint regarding Lisa Thomas, PDC Case 54966

Dear Michele Levenite:

The Public Disclosure Commission (PDC) has completed its review of the complaints and supplemental information you submitted between July 7, 2019 and July 30, 2019. Your complaint alleged that Lisa Thomas (the "Respondent") may have violated RCW 42.17A.700 and .240 by failing to timely & accurately file a financial affairs statement (F-1 report) and accurately report expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response(s) 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 for Richland City Council who announced her candidacy on March 6, 2019.
- Pursuant to RCW 42.17A.700, every candidate is required to file a Personal Financial Affairs Statement with the PDC, certifying financial activity for the preceding twelve months, within two weeks of declaring candidacy. The 2019 F-1 report, certifying financial activity for 2018, was due for candidates no later than June 3, 2019. However, based on the date the Respondent became a candidate (3/6/19), her F-1 report was due April 9, 2019.
- The Respondent filed a Personal Financial Affairs Statement (F-1 report) with the PDC on June 7, 2019, which was 59 days late. The Respondent apologized for the late report and indicated it would not happen again. As a first-time candidate, the Respondent said she was unprepared to complete a lengthy financial report and had to locate mortgage and tax records, which led to the delay.
- On the F-1 report, candidates and elected officials must disclose, for the period being reported, 1) any officer, director, partnership or trustee positions held with any corporation, company, union, association, joint venture or other entity; and 2) if they were a partner or member of any limited partnership, limited liability partnership, LLC, professional LLC, or similar entity. Candidates and elected officials must also disclose, for the period being reported, 1) ownership interest of 10% or more in any company, corporation, partnership, joint venture or other business; and 2) businesses owned by the filer, their spouse, registered domestic partner or dependents.

- The Respondent publicly stated that she is a “stakeholder in 3 local businesses” and the Complainant alleged that the Respondent failed to disclose this information on her F-1 report. The Respondent indicated that the term “stakeholder” was intended broadly to mean she has a stake, or interest, in three local businesses. The Respondent is not required to disclose businesses in which she simply has a stakeholder interest.
- As a candidate, the Respondent is required to report contributions and expenditures on a Campaign Summary Receipts & Expenditures (C-4) report that is filed with the PDC on a monthly or periodic basis (depending on the election cycle).
- On her May C-4 report, the Respondent failed to timely and accurately report a \$75 in-kind contribution for a Lincoln Day Dinner ticket and a \$134.76 candidate filing fee because the former was purchased for her and the latter was paid for out of her personal funds. Upon being notified on August 1, 2019 that this information is required to be disclosed on a C-4 report, the Respondent made a good-faith effort to quickly resolve the issue by amending her May C-4 report the next day (8/2/19) (see report #100921834).
- The Respondent’s campaign made a \$250 donation to Benton County Republican Party on June 18, 2019 for an ad in its Lincoln Day program and timely reported this information on its 21-day pre-primary C-4 report (covering activity for 6/1 - 7/15). However, the campaign erroneously mislabeled the expenditure, misattributing it to the campaign’s Treasurer as an accounting expense. After being notified of this error on July 26, 2019, the Respondent made a good-faith effort to resolve the issue by amending her 21-day pre-primary C-4 report to include the correct information within 3 days (on 7/29/19) (see report #100920010).
- Mitigating factors in this case include: The Respondent’s status as a first-time candidate; the noncompliance was the result of a good-faith error or omission; the Respondent’s filing history shows noncompliance was isolated or limited in nature; the amount of late reported activity was small in proportion to the amount of activity that was timely reported by the Respondent; and the relatively small size of the Respondent’s campaign.

Based on these findings, staff has determined that, in this instance, failure to timely file an F-1 report certifying financial activity for 2018 and failure to timely & accurately report contributions & expenditures does not amount to a violation warranting further investigation.

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 her reports, making the necessary technical corrections.

PDC staff is reminding Lisa Thomas about the importance of timely filing an F-1 report within two weeks of declaring candidacy, and timely and accurately reporting contributions & expenditures, including in-kind contributions and in-kind loans.

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@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s \_\_\_\_\_  
 Tabatha Blacksmith  
 Compliance Coordinator

Endorsed by,

/s\_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Lisa Thomas