



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

December 12, 2019

Delivered electronically to Anthony Martinelli at “[info@martinelliforcouncil.com](mailto:info@martinelliforcouncil.com)”

Subject: Complaint filed by Glen Morgan, PDC Case 57748

Dear Mr. Martinelli:

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

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of the timely and accurate disclosure of all expenditure activities, specifically including any required detail and vendor breakdown as prescribed in WAC, the timely and accurate disclosure of candidate’s personal funds deposited into the campaign account, and the timely and accurate disclosure of all reportable financial information on F-1 reports. PDC staff expects in the future that you will timely and accurate file reports of campaign activities and personal financial affairs information in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

\_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

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



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December 12, 2019

Delivered electronically to Glen Morgan at “[glen@wethegoverned.com](mailto:glen@wethegoverned.com)”

Subject: Complaint regarding Anthony Martinelli, PDC Case 57748

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 20, 2019. The complaint alleged that Anthony Martinelli, a candidate for Des Moines City Council, Position 6 in 2019, may have violated: (1) RCW 42.17A.235, RCW 42.17A.240 & WAC 390-16-037 for failure to timely and accurately describe expenditures on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for election year 2017 & 2019; (2) RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports); and (3) RCW 42.17A.700 & .710 for failure to timely and accurately file Personal Financial Affairs Statement (F-1 report) as a candidate.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Mr. Martinelli; the applicable PDC reports filed by Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- Anthony Martinelli (Martinelli for Des Moines City Council) filed a Candidate Registration (C-1 report) on January 6, 2019, declaring his candidacy for Des Moines City Council, Position 6 in 2019, and choosing the “Full Reporting” option. Apart from approximately one month in the first quarter of calendar year 2019, Mr. Martinelli served as his own treasurer for the campaign.
- On January 23, 2019, Mr. Martinelli filed a candidate F-1 report disclosing personal financial information for the previous twelve months. Mr. Martinelli submitted an amendment to the F-1 on October 25, 2019 to disclose a reportable business ownership.
- Mr. Martinelli (Elect Martinelli) filed a C-1 report declaring his candidacy for Des Moines City Council, Position 1 in 2017 election, and choosing the “Full Reporting” option.

Allegation 1: Violation of RCW 42.17A.235, .240 & WAC 390-16-037 for failure to timely and accurately describe expenditures connected to the production of campaign signs and other political advertising costs on C-4 reports for election year 2017 & 2019.

- On April 1, 2019, the Martinelli for Des Moines City Council campaign filed a C-4 report disclosing a \$902 expenditure on March 15, 2019 made to Signs By Tomorrow for “yard signs and frames” for election year 2019.

- On July 18, 2017, the 2017 Elect Martinelli campaign filed a C-4 report disclosing a \$247.04 expenditure on June 5, 2017 to Signs By Tomorrow for “yard signs” and a \$108 expenditure on June 30, 2017 to LOL Dudez, LLC for “online advertising”. On October 17, 2017, the 2017 Elect Martinelli campaign filed a C-4 report disclosing a \$400 expenditure on September 10, 2017 to Facebook for “Facebook ads for the Elect Martinelli page” and a \$247.04 expenditure on September 30, 2017 to Signs By Tomorrow for “yard signs”.
- The complaint alleged that the descriptions were insufficient and not consistent with examples identified in WAC.
- In his response, Mr. Martinelli stated that he believed the number of yard signs did not need to be included in expenditure descriptions and that the C-4 reports referenced in the complaint would be amended.
- On October 28, 2019, the Martinelli for Des Moines City Council campaign submitted an amended C-4 to include a more detailed description of the 2019 election expenditure that included the number of yard signs and stakes purchased.
- On November 20, 2017, the 2017 Elect Martinelli campaign submitted two amended C-4 reports to include a more detailed description of the 2017 election expenditure that included the number of yard signs and the advertising services provided by LOL Dudez, LLC and Facebook.
- Two additional C-4 reports for election year 2019 and two C-4 reports for election year 2017, not specifically referenced in the complaint, were amended to include detailed descriptions for advertising expenditures.

Allegation 2: Violation of RCW 42.17A.235 & .240 for failure to timely and accurately disclose candidate’s personal funds on C-3 reports.

- On March 31, 2019, the Martinelli for Des Moines City Council campaign filed a C-3 report disclosing receipt of a \$1,500 contribution in personal funds from the candidate but showed an aggregate total of candidate contributions of \$1,525. An additional \$500 contribution of candidate personal funds was received on April 18, 2019 and disclosed on a C-3 report filed April 22, 2019 but showed an aggregate total of \$2,927.
- The complaint alleged that the \$902 included in the aggregate total on the April 22, 2019 C-3 report had not been properly accounted for on other C-3 or C-4 reports submitted by the campaign.
- In his response, Mr. Martinelli stated that the \$902 dollars was an expenditure that had mistakenly been entered as personal funds.
- On December 9, 2019, the Martinelli for Des Moines City Council campaign submitted two amended C-3 to correct the errors originally reported in the aggregate total of funds from the candidate. Staff found that the \$902 dollar expenditure was disclosed on the C-4 covering the month of March 2019.

Allegation 3: Violation of RCW 42.17A.700 & .710 for failure to timely and accurately disclose reportable business ownership information on the F-1 report required to be filed as a candidate in the 2019 election.

- The complaint alleged that Mr. Martinelli failed to disclose ownership interest in “The Joint Blog”, an online business and blog site, the candidate stated he owned until its sale in May 2019.

- On October 25, 2019, Mr. Martinelli submitted an amended F-1 with Supplement page to include his ownership interest in TheJointBlog.com, identifying his position as co-founder and disclosed no reportable governmental or business customers.

The complaint included additional allegations regarding possible inaccurate disclosure of reportable income on the F-1, Section 1. No evidence was found showed that Mr. Martinelli failed to include sources of income required by statute.

Anthony Martinelli was an unsuccessful candidate in 2017 and had a separate individual acting as his treasurer and filing campaign reports. During the 2019 Des Moines City Council campaign, other than approximately one month, he served as his own treasurer and did not list any other officers or committee members. It appears that his failure to disclose adequate descriptions for campaign expenditures on C-4 reports, the mistaken entry of an expenditure as candidate's personal funds, and his failure to disclose a reportable business ownership interest on his candidate F-1, was due to inexperience and general misunderstanding. Mr. Martinelli responded promptly to the complaint, worked with PDC staff to correct his reports and has not previously been found in violation of PDC laws or rules.

Based on these findings staff has determined that, in this instance, failure to timely and accurately file a small number of C-3 and C-4 reports and failure to include a reportable business ownership interest on the candidate F-1 report, does not amount to a finding of a violation warranting further investigation.

PDC staff is reminding Mr. Martinelli about the importance of the timely and accurate disclosure of all expenditure activities, specifically including any required detail and vendor breakdown as prescribed in WAC, the timely and accurate disclosure of candidate's personal funds deposited into the campaign account, and the timely and accurate disclosure of all reportable financial information on F-1 reports in any future PDC reports in accordance with the statutes and rules.

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 Jennifer Hansen at 1-360-586-4560, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Anthony Martinelli