



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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October 28, 2019

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

Subject: Complaint regarding April Baker, PDC Case 58094

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 27, 2019. Your complaint alleged that April Barker, a candidate for Mayor for the City of Bellingham in 2019, may have violated RCW 42.17A.240 and .445 by failing to provide sufficient expenditure details and for personal use of campaign contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the April Barker for Bellingham Mayor Committee (Campaign); and the response to the allegations provided by Jason Bennett on October 16, 2019, on behalf Ms. Barker.

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

- On March 5, 2019, April Barker filed a Candidate Registration (C-1 report) declaring her candidacy for Mayor for the City of Bellingham in 2019, selecting the Full Reporting Option and listing Leslie Brendible and Jason Bennett as the Campaign Manager and Treasurer, respectively.
- Ms. Baker is an incumbent Bellingham City Council member since being to that office in 2015.
- On April 3, 2019, Ms. Barker filed an amended C-1 report and replacing Leslie Brendible with Mackenzie Graham as Campaign Manager.

Allegation One: Misuse of campaign funds for personal use.

- Staff reviewed the two reports you referenced in your complaint to support this allegation. On June 6, 2019 and July 26, 2019, the Campaign made \$240.64 and \$161.32 in expenditures, respectively to Verizon Wireless for cellular phone service for the Campaign covering the months of June and July 2019.
- In her response to this allegation, by way of the Campaign treasurer Jason Bennett, Ms. Barker stated, that this is “not her personal cell phone as Mr. Morgan alleges, but rather a specific campaign line.”

Allegation two: Failure to accurately describe expense.

- Staff reviewed the description of the expenditures as listed in your complaint that were made by the Campaign on June 5, 2019 and June 28, 2019, through Blue Spruce, for “yard signs”, and from Capital City Press for \$411.70 and \$625.03, respectively. Staff also reviewed an additional \$1,800 expenditure made to Capital City Press on June 5, 2019 for the political advertisement to be distributed door-to-door.
- Staff found that the expenditures lacked a complete description(s) as required by PDC statutes, rules and reporting requirements, including the number of items printed for each expenditure attributable to each vendor listed above.
- In its response, the Campaign stated that the expenditures made and listed in the complaint were for five small print jobs undertaken by vendors for the Campaign, and the C-4 reports have been amended disclosing “the number of items pieces printed, including small business card orders and orders of two signs”. The response noted that “Many of our existing print orders had disclosed the number of pieces ordered properly. However, a few had accidentally been submitted without the numbers printed on the description. Those few, minor examples have been updated and reports amended the same day the complaint was filed.”
- It appears that the noncompliance was a result of a minor error, which the Campaign remedied by filing amended C-4 reports as soon as they received a copy of the complaint. Additionally, Ms. Barker does not have any prior violations with the PDC.

Based on these findings staff has determined that, in this instance, the Campaign’s failure to properly and accurately describe an expenditure and report an in-kind donation/contribution to her campaign, does not amount to a violation warranting further investigation.

Ms. Barker made minor or ministerial errors on several expenditure disclosed on its C-4 reports, which did not materially impact the public interest since the expenditures were timely disclosed on the initial reports. After being notified of the error by the PDC, Ms. Barker amended the C-4 reports the same day disclosing the proper expenditure descriptions and 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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

Endorsed by,

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavalley, Executive Director

cc: April Barker