



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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November 7, 2019

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Elizabeth Hartsoch, PDC Case 58101

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 Elizabeth Hartsoch, a candidate for City Council Member for the City of Bellingham in 2019, may have violated RCW 42.17A.240 by failing to provide sufficient expenditure details and report candidate filing fee.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the C-3 and C-4 reports filed by the Beth for Bellingham Committee (Campaign); and the response to the allegations provided by Suzanne Munson on October 6, 2019, on behalf Ms. Hartsoch.

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

- On May 13, 2019, Elizabeth Hartsoch filed a Candidate Registration (C-1 report) declaring her candidacy for City Council Member (Position 1) for the City of Bellingham in 2019, selecting the Full Reporting Option and listing Brian Mulligan and Suzanne Munson as Campaign Manager and Treasurer, respectively.

Allegation One: Failure to accurately report campaign expenditure.

- Staff reviewed the July 2019 C-4 report and found that the Campaign, through its consultant, Blue Spruce Strategies LLC, made \$1,302.21 in expenditures toward pieces of walk literature but did not include the number of literature materials purchased. Staff also found that the Campaign did not properly describe some expenditures as required by law/rule.
- In its response to this allegation, by way of the Campaign treasurer Suzanne Munson, Ms. Hartsoch stated, the "Campaign purchased 10,000 pieces of walk literature in July – we have amended and refiled the July 2019 C4 to reflect the quantity." The Campaign also changed the description of all Facebook expenses from "FB targeted posts" to "Facebook Ads."

Allegation two: Concealment of campaign expense(s) from the public.

- Staff reviewed this allegation and found the Campaign initially neglected to report the PDC filing fee as required by the statute, but later amended its May 2019 C-4 to depict reimbursement for registration/filing fee in the

amount of \$271.32. In its response to this allegation, the Campaign, by way of its treasurer, Susanne Munson, stated “this fee was paid by the candidate (Elizabeth Hartsoch) via a personal credit card, and the campaign neglected to report the reimbursement of this fee to the candidate (was reimbursed to candidate on 5/31/19). We have amended the May 2019 C-4 to reflect that the candidate was reimbursed for this expense.”

- 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. Hartsoch is a first-time candidate who 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 a contribution for registration fee to her own campaign filing fee, does not amount to a violation warranting further investigation.

Ms. Hartsoch made minor or ministerial errors on a few expenditures disclosed on her C-4 reports, which did not materially impact the public interest since the expenditures were timely disclosed on the initial reports, except for the filing fee, which was included after the May 2019 C-4 was amended. After being notified of the error by the PDC, Ms. Hartsoch amended the C-4 reports after four days of receiving the complaint 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

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

s/ _____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director

cc: Elizabeth Hartsoch

