



**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)

October 31, 2019

Delivered electronically to “ [daniel.hammill@gmail.com](mailto:daniel.hammill@gmail.com) ”

Subject: PDC Case 58102

Dear Daniel Hammill:

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.

PDC staff is reminding you about the importance of timely and accurately disclosing all expenditures, including the candidate filing fee and any in-kind loans or contributions from the candidate to the campaign. PDC staff expects that you will report this information 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 Lavallee  
Executive Director

-----



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

October 31, 2019

Delivered electronically to "[glen@wethegoverned.com](mailto:glen@wethegoverned.com)"

Subject: Complaint regarding Daniel Hammill, PDC Case 58102

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 27, 2019. Your complaint alleged that Daniel Hammill (the "Respondent") may have violated RCW 42.17A.240 by failing to report his candidate filing fee and provide sufficient expenditure details on C-4 reports.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Respondent, and the applicable PDC reports filed by the 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 candidate for Bellingham City Council, having registered as a candidate with the PDC on March 21, 2019. The Respondent selected the full reporting option.
- Pursuant to RCW 42.17A.240, candidates who select the full reporting option are required to report campaign financial activity to the PDC on periodic basis (as determined by the election cycle). Among other things, candidates are required to report contributions, expenditures and loans, including out-of-pocket purchases made by the candidate and the "purpose" of each expenditure.
- WAC 390-16-037 states that goods and/or services reported as expenditures shall be described "in detail" and these details should include how the recipient of the expenditure (e.g. vendor) will use the goods and/or services purchased. The rule goes on to provide examples of expenditure reporting that include numerical descriptions (e.g. the number of items printed).
- The Respondent did not timely report the candidate filing fee on his May C-4 report and provide sufficient details of an expenditure to AMS Print & Mail Specialist on his 7-day pre-primary C-4 report.
- Upon being notified of the missing information, the Respondent took corrective action and made a good-faith effort to comply by amending the necessary reports. In his response, the Respondent indicated noncompliance was the result of a misunderstanding.

- Pursuant to WAC 390-37-061, the following are mitigating factors in this case: The Respondent's incomplete reports were the result of good-faith omissions, which he took steps to remedy. Noncompliance resulted, in part, from campaign staff's demonstrated good-faith uncertainty concerning PDC instructions. Finally, the Respondent does not have any prior violations with the PDC.

Based on these findings, staff has determined that, in this instance, the Respondent's failure to timely and accurately report the candidate filing fee and sufficiently describe an expenditure does not amount to a violation warranting further investigation.

PDC staff is reminding the Respondent about the importance of timely disclosing all expenditures, including the candidate filing fee and any in-kind loans or contributions from the candidate to the campaign.

The Respondent also made a minor or ministerial error on a required report, which did not materially impact the public interest. Upon notification of the insufficient expenditure detail, the Respondent amended the report, making the necessary technical correction.

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 Lavalley  
Executive Director

cc: Daniel Hammill