



**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 • Website: www.pdcc.wa.gov

January 23, 2020

Delivered electronically to Elizabeth Hallock at “ehallock.law@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 59412

Dear Ms. Hallock:

Below is a copy of an electronic letter sent to Glean 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 including detailed descriptions for all in-kind contributions disclosed on C-4 reports. PDC staff expects in the future that you will include detailed descriptions for all in-kind contributions, using abbreviations as needed, to ensure transparency for the public in accordance with PDC laws and rules.

PDC staff is reminding Elizabeth Hallock about the importance of including detailed descriptions for all in-kind contributions disclosed on C-4 reports, in accordance with the statutes 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.

Sincerely,

/s

Jennifer Hansen
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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January 23, 2020

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding Elizabeth Hallock, PDC Case 59412

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 29, 2020. The complaint alleged that Elizabeth Hallock, a candidate for Yakima City Council, Position 4 in 2019, may have violated RCW 42.17A.235, .240 & WAC 390-16-037 for failure to timely and accurately describe expenditures on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) expenditures undertaken by the Campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Elizabeth Hallock; 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:

- Elizabeth Hallock (Liz Hallock for Yakima City Council) filed a Candidate Registration (C-1 report) on February 22, 2019, declaring her candidacy for Yakima City Council, Position 5 in 2019, listing herself as treasurer, and choosing the “Full Reporting” option.
- On August 4, 2019, the 2019 Liz Hallock for Yakima City Council campaign submitted a C-4 disclosing a June 26, 2019 in-kind contribution from the candidate in the amount of \$2,180 to TSM.
- On November 6, 2019, the 2019 campaign updated the August 4, 2019 in-kind contribution by submitting an amended C-4 disclosing the expanded description “town square media radio ads (KIT and rock station).”
- On October 14, 2019, the 2019 campaign submitted an amended C-4 disclosing an October 3, 2019 in-kind contribution from the candidate in the amount of \$3,428.96 to Vistaprint for postcard mailers and postage costs.
- On November 6, 2019, the 2019 campaign updated the October 3, 2019 in-kind contribution by submitting an amended C-4 disclosing an expanded description that included the content of the mailer as well as other relevant information.
- The complaint alleged that the descriptions for each of these in-kind contributions were insufficient.
- In her response, Ms. Hallock noted difficulties with updating descriptions using the PDC’s Online Reporting of Campaign Activity (ORCA) software and noted that the description fields truncate. Staff confirmed the character and other technical limitations included in Ms. Hallock’s response.

- In response to staff's request, and using abbreviations where feasible, Ms. Hallock updated the in-kind contribution descriptions specifically referenced in the complaint as well as others on the same report and throughout the 2019 campaign.

Based on activity disclosed on C-4 reports, the 2019 Liz Hallock for Yakima City Council campaign reported more than \$30,000 in total campaign activity and was entirely funded by the candidate via in-kind contributions. Ms. Hallock promptly responded to the complaint and submitted amendments to provide details regarding missing or otherwise deficient information. Although Ms. Hallock has previous experience as a candidate, it appears that the lack of detail provided for her out-of-pocket expenditures were not done to mislead the public or prevent transparency.

Based on our findings staff has determined that, in this instance, failure to include complete descriptions for in-kind contributions from the candidate, does not amount to a finding of a violation that warrants further investigation.

PDC staff is reminding Elizabeth Hallock about the importance of including detailed descriptions for all in-kind contributions disclosed on C-4 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.

Sincerely,

/s

Jennifer Hansen
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Elizabeth Hallock