



**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.pdcc.wa.gov](http://www.pdcc.wa.gov)**

December 20, 2019

Delivered electronically to "info@voteforvogeli.com"

Subject: Complaint filed by Carl Schoenleber, PDC Case 60018

Dear Elizabeth Vogeli:

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

As noted in the letter to Carl Schoenleber, 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.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 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

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Tabitha Townsend  
Compliance Coordinator

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director



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December 20, 2019

Delivered electronically to “carls.vista@gmail.com”

Subject: Complaint regarding Elizabeth Vogeli, PDC Case 60018

Dear Carl Schoenleber:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 7, 2019. The complaint alleged that Elizabeth Vogeli (Respondent), a Candidate for City of Everett City Council Member may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

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

- Pursuant to RCW 42.17A.235, .240 the Respondent is required to report timely and accurately all contributions and expenditures undertaken by the campaign.
- The space being used for meetings and campaign headquarters were alleged to be either in-kind contributions or unreported expenditures; it was also alleged that the dollar amount would have exceeding limits if in fact in-kind contributions.
- The space being used for meetings and as campaign headquarters is included in the contract of the consulting firm that the Respondent has under contract, as this is part of the service paid for by the Respondent it was reported on C-4 reports as it is included in the consulting fees paid to PNWR Strategies, which lacked the detailed descriptions of expenditures required by RCW 42.17A.240 and WAC 390-16-205, Example B, which requires disclosure of the services rendered without itemization when no sub-vendors are utilized.
- The Respondent filed amended C-4 reports on December 15, 2019 to include the space for meetings and headquarters address, included in the PNWR Strategies consulting contract, in the details of expenditures for consulting fees.

Based on our findings staff has determined that, in this instance, failure to disclose the detailed description as demonstrated in WAC 390-16-205 does not amount to a violation that warrants further investigation.

Elizabeth Vogeli made minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of these errors, Elizabeth Vogeli timely amended their reports, making the necessary technical corrections as requested by staff.

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 Tabitha Townsend at 1-360-586-4555 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

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Tabitha Townsend  
Compliance Coordinator

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Elizabeth Vogeli