



**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)**

April 9, 2020

Delivered electronically to Elizabeth Hallock at “[ehallock.law@gmail.com](mailto:ehallock.law@gmail.com)”

Subject: Complaint filed by Kenton Gartrell, PDC Case 60723

Dear Ms. Hallock:

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

As noted in the letter to Mr. Gartrell, the PDC has concluded its investigation and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

The complaint alleged that you had violated RCW 42.17A.205 by failing to timely file the C-1 report registering your campaign with the PDC. Staff found that the C-1 was timely submitted on January 31, 2019 and is dismissing this allegation in accordance with WAC 390-37-070.

Pursuant to WAC 390-37-060(1)(f), you completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 for failing to timely file the 21-Day Pre-Primary C-4 report; and (2) failing to timely file the 7-Day Pre-Primary Election C-4 report during the 2019 election. The \$300 penalty assessed resolves these allegations.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to include adequate detail for expenditures made directly to vendors using personal funds and disclosed as in-kind contributions. Staff expects you to use RCW 42.17A.240 and WAC 390-16-037 as a guide for descriptions of expenditure activities disclosed as in-kind contributions, in future years. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or 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](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically signed Jennifer Hansen*

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Jennifer Hansen  
Compliance Officer

Endorsed by,

*Electronically signed Peter Lavallee*

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Peter Lavallee  
Executive Director



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April 9, 2020

Delivered electronically to Kenton Gartrell at “kentangartrell@hotmail.com”

Subject: Complaint regarding Elizabeth Hallock, PDC Case 60723

Dear Kenton Gartrell:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on December 9, 2019. The complaint alleged that Elizabeth Hallock, a candidate for Yakima City Council, Position 4 in 2019 may have violated: (1) RCW 42.17A.205 for failure to timely file a Candidate Registration report (C-1 report) within two weeks of becoming a candidate in the 2019 election; and (2) RCW 42.17A.235 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing in-kind contributions made by the candidate to her 2019 campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; 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 January 31, 2019, declaring her candidacy for Yakima City Council, Position 5 in 2019, and choosing the “Full Reporting” option.
- Ms. Hallock’s name appeared on the 2019 primary and general election ballots, and was required to disclose campaign activity on a monthly basis if more than \$200 was received or expended since the last C-4 was filed and 21-days and 7-days prior to the August 6, 2019 primary election and the November 5, 2019 general election.

Allegation 1: Violation of RCW 42.17A.205 for failure to timely file a Candidate Registration report (C-1 report) within two weeks of becoming a candidate in the 2019 election.

- Elizabeth Hallock publicly announced her candidacy for Yakima City Council, in the online version of the Yakima Herald on January 25, 2019 and was required to file a C-1 report registering her campaign by no later than February 8, 2019.
- Staff found that Ms. Hallock’s C-1 was timely submitted on January 31, 2019.

Allegation 2: Violation of RCW 42.17A.235 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing in-kind contributions made by the candidate to her 2019 campaign.

- On August 3, 2019, the Liz Hallock for Yakima City Council Campaign filed an amended 21-Day Pre-Primary C-4 report disclosing in-kind contributions from the candidate in the amount of \$4,638.77. This amount included \$1,982.45 of previously undisclosed in-kind contributions, including: (1) \$765.20 to the Yakima Herald for advertising; (2) \$1,125.25 for a billboard; and (3) \$92 for payroll. All three in-kind contributions were due to be reported by July 16, 2019 and were disclosed 19 days late.
- On August 3, 2019, the Liz Hallock for Yakima City Council Campaign filed the 7-Day Pre-Primary C-4 report disclosing in-kind contributions from the candidate in the amount of \$637.50 for advertising in the Yakima Herald. The 7-Day Pre-Primary C-4 report was amended on August 4, 2019, disclosing a previously undisclosed in-kind contribution of \$1,975, also for advertising in the Yakima Herald. Both in-kind contributions were due to be reported by July 30, 2019 and were disclosed five and six days late, respectively.
- Staff found a small number of other late-reported, in-kind contributions that were made outside of the three-week time period before the primary and general elections that did not warrant additional enforcement action.

Staff Allegation: Violation of RCW 42.17A.240 & WAC 390-16-037 for failure to accurately describe the specific details of goods and services purchased directly by the candidate and disclosed on C-4 reports as in-kind contributions to the 2019 campaign.

- RCW 42.17A.240 describes the specific content required to be disclosed on C-4 reports, including contributions and expenditures.
- The words “contribution” and “expenditure” are defined in RCW 42.17A.005 and include the transfer of goods or services disclosed on a C-4 report as in-kind contributions.
- WAC 390-16-037 obligates any person required to report the “purpose” of an expenditure under RCW 42.17A.240(6) to describe in detail the goods and/or services provided by the expenditure. The rule includes two examples for disclosing the details of the goods and/or services provided.
- Staff advise that the detailed description methods prescribed for an expenditure made from a campaign account directly to a vendor apply equally to similar expenditures made by the candidate to a vendor when being disclosed as an in-kind contribution.
- During the investigation, staff found that a small number of descriptions for in-kind services paid for by Ms. Hallock and provided to the campaign did not include this level of detail. Ms. Hallock amended some of the descriptions for advertisement expenses to include the number of pieces and additional vendor detail.

After a careful review of the alleged violations and relevant facts, PDC staff has concluded its investigation.

Pursuant to WAC 390-37-060(1)(f), Elizabeth Hallock completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 for failing to timely file the 21-Day Pre-Primary C-4 report; and (2) failing to timely file the 7-Day Pre-Primary Election C-4 report during the 2019 election. The \$300 assessed penalty resolves these allegations.

During its investigation, staff found that some of the descriptions for in-kind contributions made by the candidate, Elizabeth Hallock, to the 2019 Liz Hallock for Yakima City Council campaign were insufficient. Pursuant to WAC 390-37-060(1)(d), Ms. Hallock will receive a formal written warning concerning her failure to include adequate detail for expenditures made directly to vendors using personal funds and disclosed as in-kind contributions. The formal written warning will include staff's expectation that Ms. Hallock will use RCW 42.17A.240 and WAC 390-16-037 as a guide for descriptions of expenditure activities disclosed as in-kind contributions, on future reports. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

The complaint included evidence showing that Elizabeth Hallock publicly announced her candidacy for Yakima City Council, in the online version of the Yakima Herald on January 25, 2019 and alleged that she had violated RCW 42.17A.205 by failing to timely file the C-1 report registering her campaign with the PDC. Staff found that Ms. Hallock's C-1 was timely submitted on January 31, 2019 and is dismissing this allegation in accordance with WAC 390-37-070.

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@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

*Electronically signed Jennifer Hansen*

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Jennifer Hansen  
Compliance Officer

Endorsed by,

*Electronically signed Peter Lavallee*

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Peter Lavallee  
Executive Director

cc: Elizabeth Hallock