

**From:** [PDC Support](#)  
**To:** [Tabatha Blacksmith](#)  
**Subject:** [TICKET Customer Reply] - Rosie Cullen: Alleged Violation of RCW 42.17A.615 for failure to timely file monthly Lobbyist Reports (L-2 reports) in calendar year 2019 (Group Enforcement 2020)  
**Date:** Friday, February 21, 2020 8:00:48 PM

---

Hi Tabatha Blacksmith,

The customer has responded to the ticket.

Rosie Cullen: Alleged Violation of RCW 42.17A.615 for failure to timely file monthly Lobbyist Reports (L-2 reports) in calendar year 2019 (Group Enforcement 2020)

Ticket comment

Tabatha,

Please submit this written statement in my place at the hearing:

I would like to submit a request to waive the \$100 fee and accept my apologies for not filing the Feb 2019 L2 report on time. I had been working briefly as a lobbyist and was still getting familiar with all the rules and understanding of who was responsible to complete the different reports. But I was then let go from my position on Feb 5th, 2019. I did not realize that I would have still been listed as a lobbyist for that employer. From that point on I did not receive any email communication from the PDC as I no longer had access to my work email. And my former employer also never forwarded me any correspondence from the PDC. The first phone call I recall getting from the PDC regarding this matter was on Feb 14, 2020.

I have since created a new online account, relinked to my lobbyist profile, updated the contact info and have completed the L2 report for Feb 2019.

I ask that you waive the fee and accept my explanation of the circumstances.

Thank you for understanding,  
Rosie Cullen

On Fri, Feb 21, 2020, 12:20 PM PDC Support <[pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)> wrote:

Hi Rosie,

Yes. Please email your written response to me by [replying to this email](#) and it should get routed directly to me.

Thank you!

Tabatha Blacksmith  
Compliance Coordinator  
360.586.8929



On Fri, 21 Feb at 11:09 AM , Rosanne Cullen <[rosie.s.cullen@gmail.com](mailto:rosie.s.cullen@gmail.com)> wrote:  
I am working on 2/24 so i cannot participate. I will submit something in writing.  
Should i email that directly to you?

Thanks,  
Rosie

On Fri, Feb 21, 2020, 10:09 AM PDC Support <[pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)> wrote:

Hi Rosie,

Unfortunately, we do not have the authority to waive the \$100 fee.

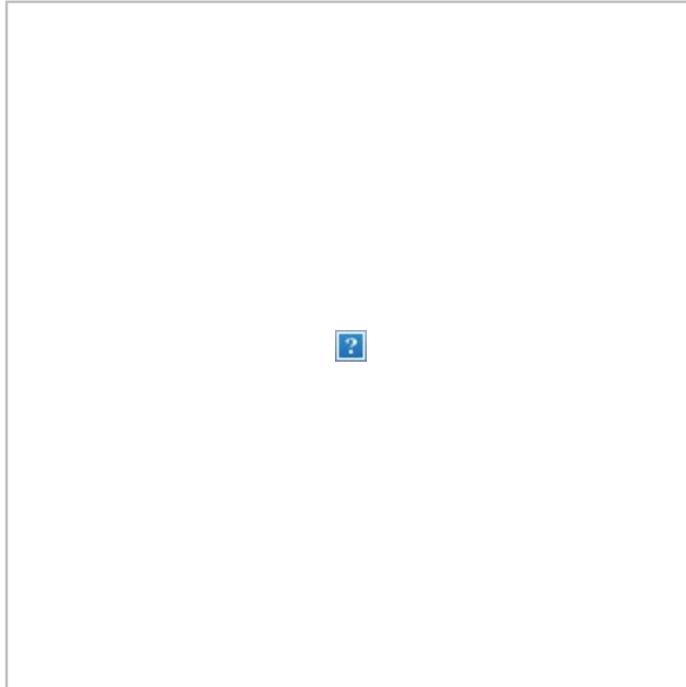
However, a request can be made at the hearing (on 2/28) that your \$150 penalty be waived by the Commission's presiding officer. You can participate in the hearing in-person or by phone. Alternatively, if you are unable to attend, you may submit something in writing and PDC staff will present it to the Commission on your behalf.

How would you prefer to participate?

Sincerely,

Tabatha Blacksmith  
Compliance Coordinator

360.586.8929



--

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission  
<http://www.pdc.wa.gov>  
1.360.753.1111

On Thu, 20 Feb at 9:22 AM , PDC Support  
<[pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)> wrote:  
Rosie,

Thank you for filing the L-2 report for  
February, 2019. Our records show the report  
was successfully submitted yesterday (2/19).

Sincerely,

Tabatha Blacksmith  
Compliance Coordinator  
360.586.8929



--

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission  
<http://www.pdc.wa.gov>  
1.360.753.1111

On Thu, 20 Feb at 9:08 AM ,  
PDC Support  
<[pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)> wrote:  
Hi Rosie,

Thank you for providing a  
written response to the hearing  
notice.

I am forwarding your request for  
a waiver to my superiors and  
will let you know what I find out.  
The Statement of  
Understanding (SOU) and \$100  
fee are offered as an option to  
filers who submit their missing  
report before the hearing and  
wish to avoid going to hearing.  
When a case goes to hearing,  
the penalty amount is \$150 -  
\$250 (depending on whether or  
not the L-2 report is filed before  
the hearing). Because the SOU

and \$100 are offered as a courtesy/alternative to a hearing, I am not sure if we can waive the fee, but I will find out.

Sincerely,

Tabatha Blacksmith  
Compliance Coordinator  
360.586.8929



--

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure  
Commission  
<http://www.pdc.wa.gov>  
1.360.753.1111

<https://wapdc.freshdesk.com/helpdesk/tickets/65085>