



State of Washington
PUBLIC DISCLOSURE COMMISSION
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October 1, 2021

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Nancy Goodloe, PDC Case 95984

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 11, 2021. Your complaint alleged Nancy Goodloe may have violated RCW 42.17A.445 for the personal use of campaign funds; and RCW 42.17A.235 and .240 for failing to timely and accurately report campaign expenditures during Ms. Goodloe's 2017 campaign for Ellensburg City Council.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Nancy Goodloe; the applicable PDC reports filed by Respondent, including several amended reports filed for the 2017 campaign with guidance from PDC Filer Assistance staff, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- PDC staff asked Nancy Goodloe for a backup copy of her 2017 campaign, and learned her 2017 treasurer, John Little, did not maintain records or make a backup copy of the campaign's filings.
- Based on instructions from PDC staff, Ms. Goodloe, and her new treasurer (Julie Petersen), reconstructed the 2017 campaign in ORCA, the PDC's filing software, based on records in Ms. Goodloe's possession, and filed amended C-4 reports and new reports, including a C-4 report for May 2017.
- Ms. Goodloe stated she did not report payment of the filing fee as an in-kind contribution to her campaign because she had lost the receipt. Payment was made on May 18, 2017. A receipt generated by the Kittitas County Auditor's Office showed the filing fee to be \$30. A copy of the receipt was provided to Ms. Goodloe and was included on an amended May 2017 C-4 report filed September 30, 2021.
- Nancy Goodloe was a first-time candidate for Ellensburg City Council in 2017.

Alleged Failure to Properly Report Loans and In-kind Contributions

- A loan amount of \$1,195.44 was reported on the 2017 campaign's original C-4 report covering the period 10/31/17 – 11/30/17, Report #100 819 802. The loan amount was based on a loan

dated 7/2/17, reported on Schedule L, but could not be reconciled with existing campaign and personal records.

- In reconstructing the 2017 campaign, Ms. Goodloe and her new treasurer verified \$318.54 of the original loan amount of \$1,195.44. This amount was made up of a \$100 monetary contribution and in-kind contributions totaling \$218.54 for a campaign mailbox, voter lists, copies, and supplies. Ms. Goodloe stated she and her 2017 treasurer agreed at the beginning of her 2017 campaign that the expenditures she paid with personal funds or personal credit card would be reported as loans, and then at the end of the campaign the loans could be forgiven, if so desired. Ms. Goodloe said, unfortunately, she and her 2017 treasurer did not revisit the loan discussion at the end of the campaign. Ms. Goodloe said she was never reimbursed for any loan amount from the 2017 campaign. In reconstructing the 2017 campaign, Ms. Goodloe and her new treasurer corrected the \$1,195.44 loan amount, and reported the amounts paid for by Ms. Goodloe as in-kind contributions that were not also loans.

Alleged Failure to Accurately Describe Expenses

- The original C-4 report covering the period 7/1/17 – 7/31/17 listed a 7/2/17 expenditure to vendor Dirt Cheap totaling \$898.23 with a description of “signs.” The report also included a 7/21/17 expenditure to vendor Vista Print totaling \$465.00 with a description of “Printing.” Ms. Goodloe stated, on July 1, 2017, she purchased yard signs for her campaign using her personal bank account debit card and reported these purchases as in-kind contributions totaling \$898.23. The quantities and amounts were: (1) Dirt Cheap Yard Signs – 18 qty. 24”x36”/\$22.05 per sign, total \$441.00; Also, 100 qty. 18”x24”/\$2.75 per sign, total \$275.00; (2) Heavy Duty Stakes – 50 qty./\$1.99 per stake, total \$99.50, Shipping \$82.73. Grand total: \$898.23. On 9/23/21, Ms. Goodloe amended the original C-4 covering the period 7/1/17 – 7/31/17, reporting additional descriptive details on Schedule A for the monetary expenditures totaling \$465.79. and reporting additional descriptive details on Schedule B for the in-kind contributions totaling \$898.23.
- The original C-4 report covering the period 9/1/17 – 10/16/17 included a 9/16/17 expenditure to vendor Vista Print totaling \$258.27 with a description of “Mailer.” On 9/23/21, Ms. Goodloe amended the 9/1/17 – 10/16/17 report by including a description of “Oversized Postcards 1000 + Door Hangers.”

Additional Expenditures Found – The following expenditures were found by Ms. Goodloe when reconstructing the 2017 campaign reports. The expenditures were reported on amended C-4 reports filed September 23, 2021.

- Knudson’s Lumber; \$36.51; 18 pieces of rebar 3/8” X 4’ sign stakes, purchased 8/11/17;
 - Vista Print; \$356.18; 21 Campaign T-shirts for rodeo parade participants and 1000 business cards, purchased 8/27/17;
 - Vista Print; \$71.39; 4 Campaign T-Shirts for rodeo parade participants; Purchased 8/27/17;
 - SHOPKO; \$132.87; 13 bags of candy to distribute to rodeo parade goers, purchased 8/27/17;
 - GMAC Photo; \$54.05; Campaign photo, Billing date: 12/18/17; Paid 12/28/17; Reported January 2018;
- Total Cost of additional expenditures: \$651.00.

Because the \$30 filing fee was added to the May 2017 C-4 report on September 30, 2021 as an in-kind contribution, all subsequent C-4 reports were amended on September 30, 2021 to reflect the additional \$30 contribution and expenditure. Nancy Goodloe was a first-time candidate. After Ms. Goodloe received

the complaint and discovered her 2017 treasurer had not maintained records or made a backup of the 2017 filings, Ms. Goodloe reconstructed her 2017 campaign based on receipts in her possession and bank records. She worked with PDC staff to file amended reports on 9/23/21. Ms. Goodloe stated the ending cash-on-hand balance on the corrected March 2018 C-4 report, \$1,123.38, reconciles to the March 2018 campaign bank balance. Ms. Goodloe stated this balance was carried forward to the 2021 campaign, which selected the Mini Reporting option. Ms. Goodloe has filed a few reports for her 2021 campaign, even though reporting is not required under the Mini Reporting option. Staff will work with Ms. Goodloe and her treasurer, Julie Petersen, to ensure the 2021 reports on file are accurate even though the campaign is not required to file additional reports for the 2021 campaign.

Based on these findings, staff has determined that in this instance, for Nancy Goodloe's 2017 campaign, the failure to properly report loans and in-kind contributions, the failure to timely report the \$30 filing fee, the failure to properly describe some expenditures, and the failure to timely report five additional expenditures totaling \$651, does not amount to a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), Nancy Goodloe will receive a formal written warning concerning her failure to file accurate and complete reports of contributions and expenditures, including her failure to properly report loans and in-kind contributions, her failure to timely report payment of her 2017 filing fee as an in-kind contribution, her failure to properly describe some expenditures, and her failure to timely report five additional expenditures totaling \$651. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or 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 Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically Signed Philip E. Stutzman

Phil Stutzman
Compliance Officer

Endorsed by,

Electronically Signed Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Nancy Goodloe