



State of Washington

PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission Statement of Understanding
Lisa Anderl: PDC Case 96486

I, LISA ANDERL, as a 2019 candidate for Mercer Island City Council, hereby
acknowledge that I violated the following:
(Candidate's Name)

RCW 42.17A.405(14) by accepting an in-kind contribution of more than \$1,000 dollars from a political action committee.

Lisa Anderl filed a candidate registration (C-1 report) as a first-time candidate on May 23, 2019, declaring her candidacy for Mercer Island City Council in the 2019 election, selecting the "Full Reporting,, option, and listing Mike Cero as Treasurer. The C-1 was amended on October 11, 2021 to reflect Mr. Cero as Ministerial Treasurer.

RCW 42.17A.005(15)(a) states, in part, that "contribution,, includes an expenditure made by a person in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a political or incidental committee, the person or persons named on the candidate's or committee's registration form who direct expenditures on behalf of the candidate or committee, or their agents.

WAC 390-05-210(3)(d) states, in part, that an expenditure made by a person in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, is a contribution to such candidate. An expenditure is presumed to be made in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, when an expenditure is made by or in consultation with any person who, during the twelve months preceding the expenditure, is or has been receiving any form of campaign-related compensation or reimbursement from the candidate, or the candidate's authorized committee or agent. However, there is no presumption that an expenditure is made in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, when a person performs only ministerial functions for two or more candidates or political committees pursuant to RCW 42.17A.005 and WAC 390-05-243.

On January 14, 2019, Mike Cero submitted a committee registration (C-1pc report) for Mercer Islanders for Sustainable Spending (MISS) selecting the “Full Reporting,, option and listing himself as the only officer and as both Manager and Treasurer.

During the month of October 2019, MISS filed Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing six expenditures for mailers and political advertisements benefitting the 2019 Lisa Anderl Campaign, along with four other 2019 Mercer Island City Council candidates.

On November 4, 2019, MISS submitted two C-6 reports disclosing independent expenditure activity supporting the 2019 Lisa Anderl Campaign in the amounts of \$2,060.32 and \$143.33 for a total of \$2,203.65 attributed to the 2019 Anderl Campaign.

For calendar year 2019, Mike Cero was the Treasurer for two committees: (1) the 2019 Lisa Anderl Campaign, for which he purportedly performed only ministerial functions, and (2) MISS, for which he was Manager, Treasurer and sole officer. Pursuant to RCW 42.17A.005(15)(a)(ii), the expenditures made by MISS were in-kind contributions to the 2019 Anderl Campaign, because Cero’s dual roles constituted “cooperation, consultation, or concert,, between the two committees. The committees cannot avail themselves of the exception to the definition of contribution found in 42.17A.005(15)(b)(ix), because Cero’s dual roles were not “[t]he performance of *ministerial* functions by a person on behalf of *two or more* candidates or political or incidental committees,, (emphasis added); *see also* WAC 390-05-210(3)(a), (b) and (d).

Therefore, the Anderl Campaign accepted contributions from MISS that exceeded the \$1,000 general election limit by \$1,203.65.


Lisa Anderl would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing) being scheduled by Public Disclosure Commission (PDC) staff. Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, Ms. Anderl is completing this Statement of Understanding and enclosing a check or money order in the amount of \$150 as a penalty payment to resolve this matter.

Lisa Anderl understands that by completing this Statement of Understanding, she is acknowledging the violation of RCW 42.17A set forth above and is waiving her right to a hearing in this matter.

Lisa Anderl further understands that this will resolve the issues of her 2019 Mercer Island City Council Campaign regarding accepting an over limit in-kind contribution from Mercer Islanders for Sustainable Spending.



(Lisa Anderl, Candidate)



(Date Signed)

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Please make your check or money order payable to the “**Washington State Treasurer**” and be sure to include the PDC Case number in the memorandum field, and mail or deliver this Statement of Understanding along with your payment/check to the PDC at the following address:

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