



**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)**

October 29, 2021

Delivered electronically to lisanderl@yahoo.com

Subject: PDC Case 98212

Dear Lisa Anderl:

Below is a copy of an electronic letter sent to Richard Erwin concerning complaints filed September 27 and October 8, 2021 with the Public Disclosure Commission (PDC) alleging violations of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports.

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning your failure to timely report as required. Staff expects you will file any required reports for the 2021 election and, in the future, timely and accurately file PDC reports and disclose contributions and expenditures as required by law.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Alice Fiman  
Compliance Officer

/s

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Peter Lavalley  
Executive Director



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October 29, 2021

Delivered electronically to [erwinr@yahoo.com](mailto:erwinr@yahoo.com)

Subject: Complaint regarding Lisa Anderl, PDC Case 98212

Dear Richard Erwin:

The Public Disclosure Commission (PDC) completed its review of the complaints you filed September 27 and October 8, 2021. The complaints alleged Lisa Anderl, who holds the office of Mercer Island City Council Position 6 and is a candidate for the same position, violated RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports

PDC staff reviewed the allegations; the applicable statutes, rules, and interpretations; the evidence provided in the complaint; information in the PDC's campaign-finance-reporting database; and a response from Lisa Anderl, to determine whether the record supports a finding of one or more violations.

We found the following:

- Lisa Anderl was first elected to the Mercer Island City Council in 2019. On March 28, 2021, she filed with the PDC as a candidate for the same office.
- The 2019 election was Anderl's first campaign for public office in Washington state.
- The complaint included alleged violations from Anderl's 2019 and 2021 campaigns.
- As noted by Anderl, there is no requirement to list a sub-vendor in this case.

**Allegations regarding 2019 campaign:**

- In response to the allegation of failure to report outstanding debts on C-4 reports filed for the period of October 15-28, 2019, Anderl stated "Due to a lack of understanding of the reporting requirements (this was my first campaign), the liabilities were not reported as a debt on Schedule B of an earlier C4. We regret any inadvertent misreporting on these two expenditures."
- On August 3, August 7 and September 15, 2021, Anderl filed an amended C-3 reports, adding the full address and occupation for those contributors identified in the complaint.

**Allegations regarding the 2021 campaign:**

- As noted above, there is no requirement to list sub-vendors for the expenditure to Strong Impressions.
- In response to the allegations regarding late C-3 reports, Anderl stated “My treasurer was new to the program and did not have all the procedures down and the timing. Regarding allegation 2., the C4 was filed within 7 days of receipt of the funds, which is how we understood the timing for reporting. We now have a clear understanding that the reports are to be filed on Mondays, not simply within 7 days of receipt of funds. We apologize for this inadvertent error.”
- Anderl timely filed her 21-day-pre-general C-4 report on October 12, 2021 and her 7-day-pre-general C-4 report on October 26, 2021 and is presently in substantial compliance with PDC reporting timelines.

Based on these findings and the fact Lisa Anderl took prompt action to comply, PDC staff has determined that, in this instance, the failure to timely and accurately report contributions and expenditures does not amount to a violation warranting further investigation.

However, Anderl will receive a formal written warning pursuant to WAC 390-37-060(1)(d) concerning the failure to timely report contributions and expenditures. The formal written warning includes staff’s expectation Anderl will, in the future, timely and accurately file PDC reports and disclose contributions and expenditures as required by law.

The Commission will consider the formal written warning in deciding on future 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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Alice Fiman  
Compliance Officer

/s

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Peter Lavalley  
Executive Director