

Response to PDC Case # 98212 – Filed 9/30/2021 pursuant to an extension granted on 9/22/2021

Please see my responses to these allegations in *italics* below. Thank you.

Lisa Anderl

Violations of WAC 390-16-205 by failing to report sub-vendors as required.

2019 Campaign

1. On her C-4 for the period of September 1, 2019, to October 14, 2019, she failed to report the sub-vendor for an expenditure of \$619.31 on September 30, 2019, to Strong Impressions for yard signs.
2. On her C-4 for the period of October 15, 2019, to October 28, 2019, she failed to report the sub-vendors(s) for a payment of \$2,378.36 to Strong Impressions on October 15, 2019, for a mailing.
3. On her C-4 for the period of October 29, 2019, to November 30, 2019, she failed to report the sub-vendor(s) for a payment of \$2,479.93 to Strong Impressions on October 29, 2019, for a mailing.

2021 Campaign

1. On her C-4 for the period of May 1, 2021, to May 31, 2021, she failed to report the sub-vendor(s) for a payment of \$1,528.36 to Strong Impressions for yard signs, stakes, and business cards.
2. On her C-4 for the period of June 1, 2021, to July 12, 2021, she failed to report the sub-vendor(s) for a payment of \$3,638.79 to Strong Impressions for a mailer. The indicia on the mailer (Seattle Permit 5544) shows that the addressing and mailing was done by Publishers Mailing Service in Seattle, but she failed to list it on her C-4. Since Publisher's is only a mail house, the name of the printer is missing on her C-4 too.

RESPONSE: *The cited rule requires reporting of sub-vendors only with regard to consultants. See, WAC 390-16-205(3) Example A. Strong Impressions is a print vendor, not a consultant, so the rule does not appear to apply in this case.*

I spoke to Carolyn Strong, the owner of Strong Impressions. This issue came up during the 2019 election cycle too. Ms. Strong called the PDC at that time about this issue, and sent me the following e-mail: "I had called them when these people originally asked to look at my books. Vendors are not required to do to give their sources. Otherwise where does it stop where the paper came from, where the ink came from? If I was a consultant and subcontracted out the printing then I would have to disclose what company did the printing but as a print shop and mailing service I do not have to give away my trade vendors. If that were the case everybody's PTC should be a mile long."

Given that the rule does not require sub-vendors from vendors, we respectfully request that this portion of the complaint be dismissed as unfounded.

Violations of RCW 42.17A.240 by failing to report outstanding liabilities.

2019 Campaign

1. On her C-4 for the period of October 15, 2019, to October 28, 2019, she failed to report an outstanding liability for \$2,378.36 to Strong Impressions for a half page mailer that is reported on her 21-day report as an expenditure on October 15, 2019. This mailer was received about the time ballots arrived, so the liability was certainly incurred before October 14th.
2. On her C-4 for the period of October 15, 2019, to October 28, 2019, she failed to report an outstanding liability of \$2,479.93 for a mailer that was ordered before October 28, 2019.

RESPONSE: *These expenses were reported when they were paid. 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.*

Violation of RCW 42.17A.235 Fail to Report Addresses, Employers, Occupations, Failing to File a C-3 within 7 days of the deposit, & failing to report aggregate contributions

2019 Campaign

1. Other than the six non-itemized contributions totaling \$150, and her own contributions to herself, she received a total of 50 itemized contributions.
 - a. She received two contributions of \$125 each on July 17, 2019, from Mark Coen and TBD Coen. An address is not provided for either TBD Coen or Mark Coen. No employer or occupation is provided for TBD Coen and no employer is provided for Mark Coen.
 - b. For 42 of the remaining 48 contributions the full address of the donor is not listed. All that is listed is the street or that it is a P.O. Box without the box number. Only 6 of her 50 (12%) itemized contributions list the full address of the donor as required by law.
 - c. Doug House made a contribution of \$200 on October 23, 2019, and his occupation is not listed.

RESPONSE: *We filed amended C3's this year between August 3 and August 7 that corrected the items listed in allegations a. and b. An amended C3 was filed on September 15, 2021 correcting the issue in allegation c. Report #110047853*

2021 Campaign

1. A donation of \$200 was received and deposited on June 20, 2021. However, the C-3 for this deposit was not filed until July 13, 2021 – several weeks late.

2. She made a deposit of \$200 on August 12, 2021 and the C-3 was filed two days late on Wednesday, August 18, 2021. It should have been filed on Monday, August 16, 2021.

RESPONSE: *Regarding allegation 1., the C3 should have been filed sooner. My treasurer was new to the program and did not have all the procedures down and the timing. This was complicated by a software upgrade that basically would not let him into ORCA. The PDC software help desk gave him a work around and he was able to install the upgrade and open ORCA. But he was off line for a few days and this slipped through the cracks.*

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.