

State of Washington PUBLIC DISCLOSURE COMMISSION

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June 10, 2025

Delivered electronically to justindleigh@gmail.com and lorrainezoller@gmail.com

Subject: PDC Case 164057 regarding Lori Zoller

Lori Zoller:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Jen Carr and Conner Edwards on December 9, 2024 and April 9, 2025 respectively. The complaints alleged violations of RCW 42.17A.710, .235 & .240 for failure to provide complete personal financial affairs details on the F-1 report and failure to timely and accurately disclose contributions and expenditures on reports.

Applicable Laws and Rules

Pursuant to <u>RCW 42.17A.710</u> An elected or appointed official is required to file a Personal Financial Affairs Statement (F-1 report) with the PDC on or before April 15th each year, that discloses accurate personal financial information for themselves and their spouse or registered domestic partner, if any, for the preceding calendar year.

Pursuant to RCW 42.17A.235(3)(a), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750.

Pursuant to RCW 42.17A.240(2), monetary contributions are disclosed on C-3 reports, which must include, but are not limited to: 1) the name and address of each person who contributed more than \$100 during the period covered by the report; 2) the monetary value and date of each contribution, except for the items specifically mentioned in subsection (2)(a) through (g); and 3) the aggregate value of all contributions received from each person during the campaign. "Contribution," as defined, includes an in-kind contribution, which is disclosed on a C-4 report.

Background and Findings

- The Respondent had not reported their debts owed on the F-1 reports from Calendar years 2022 and 2023.
- The Respondent had filed some of the C-3 and C-4 reports, but there were details missing on reports filed.
- The Respondent filed new reports to show missing contributions and expenditures, as well as amended C-3 and C-4 reports in April 2025, with PDC staff assistance, to include all missing information from contributions and expenditures.
- The Respondent amended the 2022 and 2023 F-1 reports to include the debt in accordance with RCW 42.17A.710 on May 16, 2025 and May 15, 2025 respectively.

Summary and Resolution

Due to the Respondent being in the process of a chapter 13 bankruptcy during the reporting periods at issue, there was a misunderstanding of the disclosure requirements by the Respondent under these specific circumstances. Through review with the Respondent's lawyer, we were able to examine the circumstances and clarify the requirements for them.

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purpose of this chapter. Under WAC 390-37-060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted. In this instance, the allegations in the complaint do not amount to violations that warrant further investigation.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to provide complete personal financial affairs details on the F-1 report and for failure to timely and accurately disclose contributions and expenditures on reports. PDC staff expects you to timely and accurately file all future required reports. The Commission will consider this 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 has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabitha Townsend at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed by Tabitha Townsend
Tabitha Townsend

Compliance Officer

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee Executive Director

cc: Jen Carr and Conner Edwards