



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 23, 2019

Delivered electronically to "sarahbottenberg@gmail.com"

Subject: Complaint filed by Mario Lotmore, PDC Case 25387

Dear Sarah Kneller:

Below is a copy of an electronic letter sent to Mario Lotmore concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mario Lotmore, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of accurately disclosing contributor information, whether from individuals or from groups. PDC staff expects that Sarah Keller will timely, completely, and accurately report contributor information in the future in accordance with PDC laws and rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 23, 2019

Delivered electronically to “mlotmore@gmail.com”

Subject: Complaint regarding Sarah Kneller, PDC Case 25387

Dear Mario Lotmore:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 13, 2017. The complaint alleged that Sarah Kneller (Respondent), a 2017 candidate for City Council Member of the City of Mukilteo may have violated RCW 42.17A.240 for failure to accurately disclose contributors.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- On June 14, 2017, the Respondent filed Monetary Contribution reports (C-3 reports) disclosing a series of individual contributors totaling \$800.47 deposited on May 25, 2017, and \$555 deposited on June 27, 2017.
- The complaint alleged that an \$800.47 contribution from Democracy Engine, LLC, and a \$555 contribution from Crowdpac on June 21, 2017, may have been reported inaccurately under the requirements of RCW 42.17A.240, and requested that the Respondent provide an itemized list of individual contributors instead.
- On September 25, 2017, the Respondent amended their C-3 reports to zero-out the duplicate contributions from Democracy Engine, LLC, and Crowdpac, leaving the itemized lists of contributors instead.

Based on our findings staff has determined that, in this instance, failure to accurately report contributors does not amount to a violation that warrants further investigation.

PDC staff is reminding Sarah Kneller about the importance of accurately disclosing contributor information, whether from individuals or from groups. PDC staff expects that Sarah Keller will timely, completely, and accurately report contributor information in the future in accordance with PDC laws and 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Sarah Kneller