



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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July 3, 2019

Delivered electronically to “walter@smithdietrich.com”

Subject: Complaint regarding Mathew Manweller, PDC Case 24631

Dear Walter Smith:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 1, 2017. Your complaint alleged that State Representative Mathew Manweller may have violated: (1) RCW 42.17A.445 by using active campaign funds to make a contribution to the House Republican Organizational Committee (HROC), making the expenditure a personal use of campaign funds; (2) RCW 42.17A.205 by failing to timely register his 2016 campaign committee within two weeks of having an expectation of receiving contributions or making expenditures; and (3) RCW 42.17A.235 and .240 by failing to timely report contributions received and expenditures made on C-4 reports.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; and the applicable PDC reports filed by Rep. Manweller, to determine whether the record supports a finding of one or more violations.

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

- Rep. Mathew Manweller served as a House member from the 13th Legislative District for six years, from 2013 through 2018. He was elected the final time on November 6, 2018, but resigned in December 2018, effective January 14, 2019.
- On August 12, 2016, ten days after the primary election, Rep. Manweller transferred \$72,500 in surplus funds to the House Republican Organizational Committee (HROC). He transferred the surplus funds directly from his campaign account, which is allowed, rather than transferring the funds to his surplus funds account and then transferring the funds to HROC. His treasurer should have included an expenditure description of “Transfer Surplus Funds” rather than “Committee Contribution” but the transfer was an allowable expenditure. Thus, there was not a violation of RCW 42.17A.445 for the personal use of campaign funds, as alleged.
- In a C-4 report covering May 2015, received by the PDC on 8/23/15, Rep. Manweller reported expenses of \$50 or less without itemization, totaling \$11. Although this expenditure was not more than \$200, the normal threshold for filing a C-4 report, because it was for the 2016 election, it triggered a Candidate Registration (PDC Form C-1) due within two weeks, or by 6/10/15. Rep. Manweller filed a C-1 46 days late on 7/26/15.

- The expenditures noted in your complaint as late included:
 - \$11 in May 2015 and \$11 in June 2015, not due until 8/10/15 because total expenditures during the reporting period were not more than \$200; reported 13 days late on 8/23/15;
 - \$277 in December 2015, due 1/10/16; filed 37 days late on 2/16/16;
 - \$59 in February 2016, not due until 4/10/16 because total expenditures during the reporting period were not more than \$200; filed 13 days late on 5/13/16; and
 - \$259 in March 2016, due 4/10/16; filed 33 days late on 5/13/16.

The late filed expenditures were small in size and were filed well before the 2016 primary and general elections.

The transfer of surplus funds to HROC was allowed; the Candidate Registration was filed more than one year before the 2016 elections; and the late-reported expenditures were small in amount and were reported several months before the relevant elections.

Based on these findings staff has determined that, in this instance, the failure to timely file a candidate registration, and the late reported expenditures, do not amount to an actual violation warranting further investigation.

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 Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Phil Stutzman
Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Mathew Manweller