



**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

November 27, 2018

Delivered electronically to Elizabeth Hallock at "ehallock.law@gmail.com"

Subject: PDC Case 40611

Dear Elizabeth Hallock:

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

As noted below to Conner Edwards, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning concerning your failure to file accurate C-4 reports. PDC staff expects that you will file timely and complete C-4 reports, specifically those occurring during the accelerated reporting schedule prior to and after any election in which your name appears on the ballot. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

In addition, PDC staff is reminding you about the importance of maintaining detailed records of all campaign contribution and expenditure activities, including but not limited to, invoices, receipts, ledgers and bank statements.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____
Peter Lavallee
Executive Director



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November 27, 2018

Delivered electronically to Conner Edwards at "cg.edwards@gmail.com"

Subject: Complaint regarding Elizabeth Hallock (Liz for LD 14 House of Representatives), PDC Case 40611

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 4, 2018. Your complaint alleged that Elizabeth Hallock (Liz for LD 14 House of Representatives) may have violated RCW 42.17A.235 and .240 for failure to accurately disclose contributions and expenditures on C-4 reports.

PDC staff reviewed your allegations, and as a result of staff's review, we found the following:

- On March 25, 2018, Elizabeth Hallock, filed a C-1 report declaring candidacy for State Representative in Legislative District 14, Position 2, listing Matthew Plemmons as treasurer. The C-1 was amended on March 28, 2018 to list herself as treasurer. Although, Ms. Hallock has prior experience as a candidate, this was her first time filing under the Full Reporting option and the first time utilizing the PDC's Online Reporting of Campaign Activity (ORCA) program.
- Elizabeth Hallock's name appeared on the August 7, 2018 primary ballot as one of the top two candidates and she lost in November 6, 2018 general election.

- In her response, Ms. Hallock, stated that she believed she had been entering her campaign activity correctly but that she is “not an expert at ORCA and it’s not a user-friendly program”.
- When the complaint was filed on September 4, 2018, the Liz for LD 14 House of Representatives campaign’s post-primary C-4 report disclosed a negative cash on hand balance of \$2,246.53 that included no new campaign deposits or expenses. The final amendment of the post-primary C-4 report disclosed deposits totaling \$660, expenses totaling \$1,242.87 for advertisements, canvassing and other services, as well as in-kind contributions of \$12,436.66 from the candidate for out-of-pocket expenditures for advertisements including \$1,900 to Lamar Billboards and more than \$2,000 to the Yakima Herald for advertisements.
- The Liz for LD 14 House of Representatives filed 48 original and 24 amended C-3 reports, disclosing \$7,797 in monetary contributions almost entirely received from individual donors, and \$3,100 in candidate’s personal funds. Ms. Hallock filed nine original and 78 amended C-4 reports, disclosing \$12,497 in monetary expenditures and \$86,157 for out-of-pocket expenses made by the candidate.
- The PDC held an Initial Hearing (Case Status Review Hearing) on November 15, 2018. In response to the Initial Hearing notice, Elizabeth Hallock submitted amendments to every C-4 report submitted during the 2018 campaign in order to correct numerous data entry errors and to correct the cash on hand reported on Line 18 of the C-4 reports.

Pursuant to WAC 390-37-060(1)(b), Elizabeth Hallock (Liz for LD 14 House of Representatives) will receive a formal written warning concerning failure to accurately file C-4 reports. The formal written warning will include staff’s expectation that Elizabeth Hallock (Liz for LD 14 House of Representatives) will file timely and complete C-4 reports, specifically those occurring during the accelerated reporting schedule prior to and after any election in which her name appears on the ballot. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on these facts, staff has determined that in this instance, failure to accurately file C-3 reports disclosing a small percentage of total funds used for the campaign from outside donors and C-4 reports disclosing mostly out-of-pocket expenditures made by the candidate, does not amount to an actual material violation warranting further investigation. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____

Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____

For Peter Lavalley
Executive Director

cc: Elizabeth Hallock (Liz for LD 14 House of Representatives)