



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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

January 31, 2019

Kathryn Campbell  
3242 South Bow Lake Drive  
SeaTac WA 98188

Subject: Kathryn Campbell Complaint Return Letter, PDC Case 16817

Ms. Campbell:

Below is a copy of a letter sent electronically to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC) against you. As noted below in the letter sent to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

While staff found your 2013 Campaign failed to: (1) electronically file the C-3 and C-4 reports despite spending more than \$,5000; and (2) timely file the 7-Day Pre-General Election C-4 report until after the 2013 general election had been held, the five-year statute of limitations has expired for the PDC to take enforcement action.

Pursuant to WAC 390-37-060(1)(b), you are hereby formally warned concerning the failure to timely and accurately file campaign finance reports disclosing contribution and expenditure activities undertaken by your 2013 campaign, and for failing to electronically file the C-3 and C-4 during 2013 in accordance with PDC laws and rules. With this formal written warning, we also convey PDC staff's expectation that should you become a candidate again in the future, you will file C-3 and C-4 reports electronically, and you will timely and accurately file C-3 and C-4 reports disclosing contribution and expenditure activities undertaken in accordance with PDC laws and rules. 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 this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Kurt Young, Compliance Officer

s/ \_\_\_\_\_  
Peter Lavalley, Executive Director



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January 31, 2019

Sent electronically to Glen Morgan at “glenmorgan89@gmail.com”

Subject: Complaint filed against Kathryn Campbell: PDC Case 16817

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 17, 2017.

The complaint alleged that Kathryn Campbell, a candidate seeking election to the office of City of SeaTac Councilmember in 2013, may have violated RCW 42.17A: (1) RCW 42.17A.205 by failing to timely file the Candidate Registration (C-1 report) and listing WinPower Strategies, a campaign consultant as a Committee Officer; (2) RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately file Monetary Contribution Reports (C-3 report), and Campaign Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities, including in-kind contributions, loans and outstanding debts/obligations; and (3) RCW 42.17.245 by failing to file C-3 and C-4 reports electronically using the PDC’s Online Reporting of Campaign Activities (ORCA) software, or similar campaign finance software.

PDC staff reviewed your complaint, the statutes, rules and reporting requirements, the paper-filed C-3 and C-4 reports submitted by the 2013 Kathryn Campbell Campaign, and the responses from Ms. Campbell. Based on staff’s review, we found the following:

- On May 16, 2013, Kathryn Campbell filed a Candidate Registration (C-1 report) declaring her candidacy for election to the office of SeaTac City Councilmember in 2013, selecting the Mini Reporting Option, and listing Scott Dahle as Campaign Treasurer.
- On June 20, 2013, Ms. Campbell filed an amended C-1 report changing reporting options to the Full Reporting Option. Ms. Campbell was elected to the SeaTac City Council in 2013.
- Ms. Campbell stated that she was a first-time candidate for public office in 2013, and she was not prepared for contributions she received for her campaign, which totaled more than \$13,700. She stated, “neither I nor my treasurer were aware of the rule that filing must be done electronically if donations top \$5,000.”
- Ms. Campbell stated her treasurer is now living in Hawaii, and that she relied on him to file the PDC reports since she was not familiar with the PDC filing requirements.

- Ms. Campbell stated that while she has the 2013 Campaign receipts and documentation, it would be extremely difficult for her to file the reports electronically. She stated she has never used the ORCA filing software to submit the PDC reports, has very limited knowledge of the forms, and is not aware of the candidate filing requirements.
- The C-1 report filed by the Campaign listed Scott Dahle as Treasurer, and Ms. Campbell stated that WinPower was a vendor and campaign consultant. WinPower and its agents were not a Campaign officer or principal required to have been disclosed on the Committee Registration.
- Ms. Campbell acknowledged that her Campaign failed to timely file some of the PDC reports and stated “I can see that deadlines were not met. I can only say that I relied on the campaign treasurer to submit timely.” She stated she could try to give more details, but it has been more than four years and as noted above, her Treasurer no longer resides in state. She stated that she was under the impression that the letter codes listed on the back of the Schedule A to C-4 report, indicating the general purpose of the campaign expenditures, was an adequate description and that no additional information was required to have been disclosed.
- The 7-day Pre-General Election C-4 report was required to have been filed by the Campaign on October 29, 2013. The 7-day Pre-General Election C-4 report was filed on December 11, 2013, 42 days late and 36 days after the November 5, 2013 general election had been held, disclosing \$2,300 in contributions received and \$2,3331 in expenditures made.
- It appears from staff’s review that the Campaign failed to disclose expenditures as debts or obligations on the 7-Day Pre-General Election C-4 report, that included: (1) two expenditures paid to WinPower for Facebook Advertisements (\$3,000 paid on October 31, 2013), and printing of a mailer (\$1,250 paid on November 7, 2013); (2) a portion of \$1,250 expenditure made to Richard Glover was for sign building, maintenance, and gasoline for sign placement (paid November 18, 2013, and the payment included gasoline for sign pick-up after the election); and (3) a \$529 expenditure to Capital City Press to print a mail piece.
- Ms. Campbell stated that there were no debts incurred or owed to anyone during her 2013 campaign, but she acknowledged that her Campaign disclosed some expenditure information late due to the fact her “campaign treasurer did not pay bills until received.”
- Ms. Campbell stated that the photographs used by her 2013 Campaign were taken by a friend of her father prior to the time she decided to file for office in 2013. She stated that she paid no money for the photographs so there was nothing to report. She stated that she “not pay for the postal address for my campaign but shared it with other candidates”. I did not buy a mailing list, but used Capital City Press for my mailings, whose invoices were paid by the campaign.

As noted above, the 2013 Campaign failed to: (1) timely file the 7-Day Pre-General Election C-4 report disclosing contribution and expenditure activities undertaken prior to the 2013 general election; and (2) file the C-3 and C-4 reports electronically using the ORCA campaign finance filing software. While those two issues would appear to rise to the level of material violations, the five-year statute of limitations has expired for allegations related to the 2013 election cycle, so the PDC is prevented from taking enforcement action.

Based on the foregoing information, and pursuant to WAC 390-37-060(1)(b), Kathryn Campbell will be formally warned concerning her failure to timely and accurately file campaign finance reports disclosing contribution and expenditure activities undertaken by her 2013 campaign, and for failing to electronically file the C-3 and C-4 during in accordance with PDC laws and rules. The formal written warning will include staff's expectation that Ms. Campbell, should she become a candidate again in the future, will timely file C-3 and C-4 reports, and if she meets the reporting threshold, reporting those activities electronically, in accordance with PDC laws and rules. 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 this information, the PDC has dismissed the allegations listed in the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by:

Kurt Young  
PDC Compliance Officer

Peter Lavalley  
Executive Director

cc: Kathryn Campbell

