



State of Washington

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

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April 12, 2018

Delivered electronically to Andy Lo at "treasurer@andy-lo.com"

Subject: Mukilteo for All Committee (3) Complaint Return Cover Letter, PDC Case 27838

Mr. Lo:

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

As noted below in the electronic letter to Mr. Pancerzewski, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

If you have questions, please contact PDC staff member Kurt Young by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,

/s _____
Kurt Young
Compliance Officer

Endorsed by,

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





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April 12, 2018

Delivered electronically to Charles Pancierzewski at "charlspa@msn.com"

Subject: Complaint filed against Mukilteo For All (3), PDC Case 27838

Dear Mr. Pancierzewski:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 2, 2017. Your complaint alleged that Mukilteo For All, a 2017 single year political committee may have violated RCW 42.17A.240 by failing to timely disclosed debts and obligations owed to vendors and in-kind contributions from vendors on Summary Campaign Contribution and Expenditure reports (C-4 reports).

Specifically, PDC staff reviewed your allegations that Mukilteo For All (MFA) had outstanding debts and obligations owed to many vendors, including WinPower Strategies, for which no committee funds were available to pay. You questioned if some of those vendors were required to list those obligations as in-kind contributions. Staff reviewed the campaign finance reports filed by MFA, and the response submitted on December 17, 2017. As a result of our review, we found the following:

- On October 10, 2017, MFA filed a Committee Registration (C-1pc report) registering as a 2017 single election year political committee formed to oppose Peter Zieve, a candidate for Mukilteo City Council District in 2017, selecting the Full Reporting Option and listing Glen Pickus as the Campaign Manager, and Andy Lo as Campaign Treasurer.
- On October 17, 2017, MFA timely filed an amended 21-Day Pre-General Election C-4 report, disclosing \$2,441 in contributions received, \$101 in expenditures made, and 15 liabilities owed to vendors totaling \$24,147. The \$24,147 in MFA outstanding liabilities disclosed on line #19 of the report were for debts and obligations incurred: (1) for printing and postage for a mailer; (2) to develop the Committee website, including video production; (3) for Facebook and other digital advertising; and (4) for Consulting services/retainer fees.
- On October 31, 2017, MFA timely filed the 7-Day Pre-General Election C-4 report disclosing \$3,175 in contributions received, \$5,105 in expenditures made, and \$19,447 in outstanding liabilities owed to vendors, that had previously been disclosed.
- On December 11, 2017, MFA timely filed the Post General Election C-4 report disclosing \$5,440 in monetary contributions received, \$13,650 for in-kind contributions received, and \$5,850 in expenditures made.

- The \$13,650 worth of in-kind contributions received by MFA, were for previously disclosed debts and obligations owed to vendors and included: (1) A \$5,000 in-kind contribution from Pickus Communications for “Political Consulting” services. Mr. Pickus was the Campaign Manager for MFA. (2) A \$1,500 in-kind contribution from Arthur Allen for video production. (3) Four in-kind contributions totaling \$7,500 from Mammoth for website design and development, Facebook ad design, and consulting services.

For your information, campaign finance reporting under PDC laws and regulations are based on the “accrual” basis which allows candidates and political committees to incur debts and obligations owed to vendors, as well as pledges from contributors for future monetary contributions. Candidates and political committees are required to timely and accurately disclose that information on the various schedules of the C-4 report.

PDC staff’s review indicated that Mukilteo For All timely filed its Monetary Contribution reports (C-3 reports), C-4 reports, and Independent Expenditure reports (C-6 reports) for the 2017 election, disclosing contribution and expenditure information, including debts, obligations and in-kind contributions.

Based on these findings, staff has determined that in this instance, there is no evidence that supports a finding of a material violation warranting further investigation. The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case. If you have questions, you may contact Kurt Young by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

/s _____
Kurt Young
PDC Compliance Officer

Endorsed by,

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

cc: Mukilteo For All Committee