



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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

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Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

September 11, 2018

Delivered electronically to "tamborineborrelli@gmail.com"

Subject: PDC Case 36977

Dear Tamborine Borrelli:

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

As noted below to Glen Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter since you completed a Statement of Understanding (SOU) and paid a \$300 civil penalty concerning the allegations listed in the complaint.

The SOU you completed acknowledged violations of RCW 42.17A.235 and RCW 42.17A.240 for: (1) failing to timely file the 21-Day Pre-Primary Election C-4 report and not properly itemizing expenditures during the 2016 election campaign; and (2) failing to timely file the 7-Day Pre-Primary Election C-4 report during the 2016 election.

Pursuant to WAC 390-37-060(1)(b), this letter serves as a formal written warning concerning the failure to timely and accurately file the additional C-3 and C-4 reports that PDC staff identified as being filed late by your 2016 election campaign. The formal written warning will include staff's expectation that your campaign files timely and complete C-3 and C-4 reports in future years 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 closed this matter. If you have questions, you may contact Micaiah Ragins at 360-586-4555 or toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Micaiah Titus Ragins  
Compliance Coordinator

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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September 11, 2018

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Tamborine Borrelli, PDC Case 36977

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on June 19, 2018. Your complaint alleged that Tamborine Borrelli, a first-time candidate seeking the office of State Senator in the 2nd Legislative District, may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

PDC staff reviewed your allegations, the statutes and rules, the initial and amended C-3 and C-4 reports filed by the Tamborine for Senate 2016 (Campaign), and the responses from Ms. Borrelli. As a result of staff's initial review, we found the following:

- On April 22, 2016, Tamborine Borrelli filed a Candidate Registration (C-1 report) declaring her candidacy for State Senator in the 2nd Legislative District, and selecting the Full Reporting option.
- On April 18, 2018, the Campaign filed four Monetary Contribution reports (C-3 reports) for monetary contributions that had been received between June and August of 2016. The C-3 reports were required to have been filed the following Monday for contributions deposited during the previous five calendar days. While the C-3 reports were filed more than 500 days late, they totaled \$600 in monetary contributions received (Report # 100826222, 100826223, 100826224, and 100826225).
- On June 10, 2016, the Campaign filed four C-3 reports totaling \$2,205 in monetary contributions received and deposited into the Campaign bank account on June 5, 2016 (Report # 100700867, 1007800868, 100700869, and 100700870). The C-3 reports were required to have

been filed June 6, 2016, and were filed four days late. In addition, you alleged that a C-3 report filed by the Campaign listing a June 5, 2016, deposit date for a \$50 monetary contribution received was filed 682 days late (Report # 100826330). This C-3 report was filed by the Campaign as an amended C-3 report, providing additional information to a previous filed C-3 report that was originally filed 120 days late (Report # 100705560).

- During the 2016 election, the Campaign failed to timely file any C-4 reports. The initial C-4 report was filed three days late on June 13, 2016, covering the period of May 18 through 31, 2016, (Report 100701949), disclosing \$2,753 in monetary and in-kind contributions received, \$1,361 in total expenditures, and a \$2,000 liability for an outstanding candidate loan.
- On March 23, 2018, the Campaign filed the 2016 21-Day Pre-Primary Election C-4 report disclosing \$9,153 in monetary and in-kind contributions received and \$7,762 in expenditures made (Report #100822081). The 2016 21-Day Pre-Primary Election C-4 report is a statutorily required filing that should have been filed on July 12, 2016, covering the period June 1 through July 11, 2016. The C-4 report was filed more than 619 days late.
- On March 24, 2018, the Campaign filed the 2016 7-Day Pre-Primary Election C-4 report disclosing \$570 in monetary and in-kind contributions received and \$285 in expenditures made (Report #100822081). The 2016 7-Day Pre-Primary Election C-4 report is a statutorily required filing that should have been filed on July 26, 2016, covering the period July 12 through July 25, 2016. The C-4 report was filed more than 606 days late.
- On April 5, 2018, the Campaign filed the 2016 Post-Primary Election C-4 report disclosing \$1,006 in monetary and in-kind contributions received and \$2,106 in expenditures made (Report #100822081). The 2016 Post-Primary Election C-4 report is a statutorily required filing that should have been filed on September 10, 2016, covering the period July 26 through August 30, 2016. The C-4 report was filed more than 572 days late.
- Tamborine Borrelli provided a response which stated that the six amended reports listed in the complaint were not late reports because they were filed in compliance with campaign finance laws in order to correct previous reports. Borrelli also stated that the 2016 Committee was a largely volunteer run campaign and that the treasurers had no prior training experience with filing PDC reports. The Campaign acknowledged that they failed to understand the procedures and timing of the filing requirements.

Tamborine Borrelli completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for: (1) failing to timely file the 21-Day Pre-Primary Election C-4 report and not properly itemizing expenditures during the 2016 election campaign; and (2) failing to timely file the 7-Day Pre-Primary Election C-4 report during the 2016 election.

Based on these findings and the following facts, staff has determined that in this instance, the failure to timely and accurately file the contribution and expenditure reports does not amount to a material violation warranting further investigation since: (1) Tamborine Borrelli was a first-time candidate for public office in 2016; (2) The Campaign was inexperienced with the campaign finance reporting requirements; (3) The late filed C-3 reports represented less than five percent of total monetary and in-

kind contributions received; and (4) Ms. Borrelli completed an SOU and paid a \$300 civil penalty to resolve this matter

Pursuant to WAC 390-37-060(1)(b), Tamborine Borrelli will receive a formal written warning concerning the failure to timely and accurately file the additional C-3 and C-4 reports identified in this letter. The formal written warning will include staff's expectation that Tamborine Borrelli files timely and complete C-3 and C-4 reports in future years 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.

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 Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [micaiah.ragins@pdc.wa.gov](mailto:micaiah.ragins@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Micaiah Ragins  
Compliance Coordinator

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Tamborine Borrelli