



**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)**

Nov. 14 2018

Delivered electronically to “christywatts2@gmail.com”

Subject: PDC Case 34458

Dear: Christy Watts

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint he filed with the Public Disclosure Commission (PDC) on April 11, 2018 against the Christy Watts for Kennewick City Council Committee.

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and 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 letter concerning your failure to comply with the reporting requirements for a candidate under the Full Reporting option to file timely and accurate Monetary Contribution reports (C-3) and Campaign Summary Receipts and Expenditure (C-4) reports, in accordance with RCW 42.17A.235 and .240.

In addition, please file a final C-4 report for the 2017 campaign.

This formal written warning comes with the staff’s expectation that you will file you file timely, complete and accurate reports in any future years as a candidate in accordance with PDC laws and rules. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

/s\_\_\_\_\_

Alice Fiman  
Compliance Officer  
Endorsed by,

/s\_\_\_\_\_

Peter Lavallee  
Executive Director



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Nov. 14 2018

Delivered electronically to “”

Subject: Complaint regarding Christy Watts, PDC Case 34560

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against Christy Watts, a 2017 candidate for Kennewick City Council, Position 4. The complaint alleged Watts violated RCW 42.17A.235 and .240 by failing to timely file complete and accurate Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports).

PDC staff reviewed the allegations listed in the complaint, PDC laws, rules and reporting requirements, the Candidate Registration (C-1 report), C-3 and C-4 reports filed by Christy Watts for Kennewick City Council (Committee) and the response from Christy Watts.

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

- On May 26, 2017, Christy Watts filed a C-1 report declaring candidacy for Kennewick City Council, Position 4, selecting the Mini Reporting option, and listing Sondra Rader as Treasurer.
- Watts was a first-time candidate for public office in 2017, advanced to the 2017 general election, then was defeated in the Nov. 7, 2017 general election.
- On Aug. 31, 2017, Watts requested to change from Mini to Full Reporting. This request was approved by Peter Lavalley, Executive Director of the PDC, on Sept. 12, 2017.
- In the Sept. 12, 2017 letter to Watts, PDC staff stated, “a copy of your Sept. 5, 2017 email acknowledging the apparent violation is also attached.”
- In the Sept. 5 email to the PDC, Watts stated “I realize I am out of compliance with my C-4 reporting due to the misunderstanding that my personal funds spent on miscellaneous expenditures would be counted as part of the \$5,000 spending limit.”
- During the 2017 campaign, the Committee filed C-3 and C-4 reports in two ways, by completing and mailing/emailing handwritten paper filed reports to the PDC, and by the

electronic method using the PDC's Online Reporting of Campaign Activities (ORCA) campaign filing software.

- Between Aug. 25, 2017 and Sept. 1, 2017, the Committee filed a total of 27 C-3 and C-4 reports with the PDC, which included 11 amended reports.
- The Committee failed to timely file the 21-day and 7-Day Pre-Primary Election C-4 reports for 2017, depriving the public of critical information, however filed the 21- and 7-Day Pre-General Election C-4 reports on Oct. 31, 2017, prior to the 2017 General Election.
- On Dec. 8, 2017, the Committee filed a C-4 report disclosing \$13,156.80 in total contributions received and \$12,874.54 in expenditures made during the 2017 campaign. The C-4 report was filed eight days late.

Based on these findings, and the facts that Christy Watts: (1) was a first-time candidate; and (2) was defeated in the Nov. 7, 2017 general election and (3) acknowledged a violation when she requested a change from mini to full reporting, staff has determined that in this instance, failure to timely file reports of contributions and expenditures does not amount to a material violation warranting further investigation.

Pursuant to WAC to WAC 390-37-060(1), Christy Watts will receive a formal written warning concerning the failure to comply with the reporting requirements and to timely and accurately file C-3 and C-4 reports disclosing contributions and expenditures activities in accordance with RCW 42.17A.235 and .240. PDC staff has the expectation that Watts will timely file complete and accurate reports in any future years as a candidate 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).

In addition, the PDC has also dismissed the allegations listed in your complaints that were based "on information and belief" in accordance with RCW 42.17A.755(1), since you failed to provide any evidence to support or substantiate those allegations.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at [alice.fiman@pdc.wa.gov](mailto:alice.fiman@pdc.wa.gov).

Sincerely,

/s\_\_\_\_\_

Alice Fiman  
Compliance Officer

Endorsed by,

/s\_\_\_\_\_

Peter Lavalley  
Executive Director