



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: pdcc@pdc.wa.gov • Website: www.pdc.wa.gov

November 14, 2018

Sent electronically to Michael Lilliquist at Milliquist@outlook.com

Subject: Complaint regarding Michael Lilliquist, PDC Case 34558

Dear Mr. Lilliquist:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint he filed against you 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.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning failure to timely report contributions and expenditures. This formal written warning comes with the staff's expectation that you file timely contribution and expenditure 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.

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov.

Sincerely,

Endorsed by:

Erick Agina
PDC Compliance Officer

Peter Lavalley
Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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November 14, 2018

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Michael Lilliquist, PDC Case 34558

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 11, 2018. Your complaint alleged that Michael Lilliquist may have violated RCW 42.17A.235, .265, .205, .320, and .255 by failing to timely and accurately disclose contributions, expenditures, books of account, committee registration, and sponsor ID.

PDC staff reviewed the allegations listed in the complaint you filed, the statutes, rules and reporting requirements, the Campaign Registrations (C-1s), Monetary Contribution reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure Reports (C-4 reports). As a result of staff's review, we found the following:

- Michael Lilliquist is an incumbent City Council Member for the City of Bellingham since being elected to that office in 2009.
- No evidence was provided to substantiate any allegations outside of late filings of C-3 and C-4 reports in violations of RCW 42.17A.235.
- Staff's review found that almost half of the alleged late filed C-3 and C-4 reports were for amended filings for which the initial C-3 and C-4 were filed timely or were a few days late. The remaining late filed C-3 and C-4 reports disclosed very minimal activity involving small dollar amounts, while a few were filed timely.
- Mr. Lilliquist did file a small number of late C-3 and C-4 reports as alleged, such as the C-4 covering \$4,059.17 in activity between September 1, 2017 and October 17, 2017.

Based on these findings, staff has determined that in this instance, failure to timely file a small number of C-3 and C-4 reports covering minor activity, does not amount to an actual material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Mr. Lilliquist will receive a formal written warning concerning failure to timely file C-3 and C-4 reports. The formal written warning will

convey staff's expectation that Mr. Lilliquist will fully comply with the requirement to timely file contribution and expenditure 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 and rules.

The PDC has closed this matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

Based on this information, the PDC has dismissed your complaint in accordance with RCW 42.17A.755(1)(a).

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov.

Sincerely,

Endorsed by:

Erick Agina
PDC Compliance Officer

Peter Lavallee
Executive Director

cc: Michael Lilliquist

