



**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 • Website: www.pdcc.wa.gov

July 28, 2021

Delivered electronically to empowerdesmoinessoleillewis@gmail.com

Subject: PDC Case 95681

Dear Soleil Lewis:

Below is a copy of an electronic letter sent to Yoshiko Grace Matsui concerning a complaint filed July 6, 2021 with the Public Disclosure Commission (PDC) alleging violations of RCW 42.17A.235 and .240 for failure to timely register with the PDC and timely and accurately report contributions and expenditures on Full Summary Contributions and Expenditures (C-4) reports.

As noted in the letter below, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into the allegations or take further enforcement action in this matter.

PDC staff reminds you about the importance of timely and accurately filing with the PDC and staff expects in the future you will timely and accurately file reports in accordance with PDC laws and rules.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavallee
Executive Director



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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

July 28, 2021

Delivered electronically to spark.matsui@gmail.com

Subject: Complaint regarding Soleil Lewis, PDC Case 95681

Dear Yoshiko Grace Matsui:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed July 6, 2021. The complaint alleged Soleil Lewis, a 2021 candidate for Des Moines City Council, Position 7, violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures on Full Summary Contributions and Expenditures (C-4) reports, specifically reporting expenditures for items worn in and production of YouTube video advertising.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, the evidence provided in the complaint and a response from Soleil Lewis, to determine whether the record supports a finding of one or more violations. We found the following:

- According to PDC records, there are three candidates registered for Des Moines City Council, Position 7, indicating there is a primary election for this office on August 3, 2021.
- Lewis timely registered with the PDC on March 27, 2021 and filed a Personal Financial Affairs Statement (F-1) with the PDC on March 18, 2021, noting a campaign start date of March 18, 2021. Lewis is a first-time candidate for public office.
- Lewis timely filed the 21-day-pre-primary C-4 on July 13, 2021, reporting \$8,965.30 in total contributions and \$4,383.70 in expenditures to date.
- In response Lewis stated “I am a new candidate. I apologize for any misunderstanding pertaining to the advertisement. In no way was this purposeful intent to not track campaign expenditures. The advertisement that ran were, paid for directly from my personal account, nowhere was funds taken from the campaign account. The only mistake on my part as a candidate was to note said purchases of (hat, t shirt, and banner) as in-kinds donations to the campaign. I have sent all invoices for the materials and advertisements to my treasurer, who is cc’d on this response, and she will be updating my

campaigns C4 reports to reflect these in-kind expenditures later this evening. I apologize for any misunderstandings.”

- On July 16, 2021 Lewis amended C-4 reports originally timely filed May 9, June 9 and July 13, 2021. As of July 16, 2021, Lewis reports a total of \$9,748.18 in contributions and \$5,166.58 in expenditures.
- The amended reports list an April 16, 2021 in-kind contribution for “video software for campaign videos,” a May 27, 2021 in-kind contribution for one campaign t-shirt, a May 31, 2021 in-kind contribution for Google Campaign Ad, and a June 2, 2021 in-kind contribution for a ballcap and outdoor banner. All were listed as received from Soleil Lewis.

Based on these findings, the fact Soleil Lewis is a first-time candidate, the items were paid for from personal funds with no intent to conceal the contributor and Lewis promptly took action to comply, PDC staff has determined that, in this instance, the failure to timely and accurately report contributions and expenditures does not amount to a violation warranting further investigation.

PDC staff is reminding about the importance of timely registering with the PDC and filing required reports in accordance with PDC laws and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavalley
Executive Director