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| <b>Complaint Description</b>  |
| <a href="#">Richard Erwin</a><br>Reported(Wed, 14 July 2021 at 10:07 AM)<br><br>Please see attached letter of complaint.  |
| <b>What impact does the alleged violation(s) have on the public?</b>  |
| See attached  |
| <b>List of attached evidence or contact information where evidence may be found.</b>  |
| See attached  |
| <b>List of potential witnesses with contact information to reach them.</b>  |
| See attached  |
| <b>Complaint Certification:</b>   |
| I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief. |

*Via email to:  
pdc@pdc.wa.gov*

July 6, 2021

Peter Lavelle  
Executive Director  
Washington State Public Disclosure Commission  
PO Box 40908  
Olympia, .WA 98504-0908

RE: Lisa Anderl 2019 Campaign

Dear Mr. Lavelle:

I write to supply information and evidence related to Councilmember Lisa Anderl's 2019 campaign, which failed to properly report excess contributions from Mercer Islanders for Sustainable Spending (MISS), a political action committee run by her own campaign's treasurer, Mike Cero. Councilmember Anderl's campaign filings also included technical violations of the statute by failing to list the mailing address of contributors on required C3 reports.

First, Councilmember Anderl's 2019 campaign impermissibly accepted contributions from Mercer Islanders for Sustainable spending totaling more than the \$1,000 limit for contributions from a political committee to an individual municipal candidate. Councilmember Anderl's 2019 campaign listed Mike Cero as her Treasurer on its official C1 report, qualifying him as an officer for the campaign under WAC 390-04-245. Mr. Cero also was also listed as the treasurer of MISS on its C1 form in 2019 and acts as an agent of that committee in his capacity as the PAC's main official. *See* WAC 390-05-190. He did not fall within the standards to meet the administrative or ministerial exception in WAC 390-05-243 because he did not act in a purely ministerial role for at least two campaigns in 2019. Accordingly, MISS could not possibly make an independent expenditure on behalf of Councilmember Anderl because the person making decisions as an agent for MISS was also an officer and agent for her campaign, making any expenditure by MISS in support of Councilmember Anderl a coordinated contribution. *See* WAC 390-05-210(3).

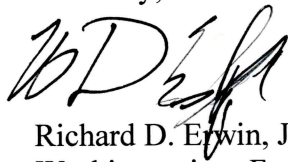
The shift from contributions reported to actual contributions is a significant one in light of MISS's spending on Councilmember Anderl's behalf. On its November 20, 2019 C6 filing, MISS reported spending \$2,346.98 in total over the course of the 2019 election advocating for either Councilmember Anderl's election or her opponent's defeat. Though she reported receiving \$12,403.99 in contributions in total, that additional funding increased her receipts by 19% in a race she won by approximately 1100 votes.

Second, in addition to substantially underreporting contributions, Councilmember Anderl's campaign also violated RCW 42.17A.240(2), by failing to list the address for contributors on her required C3 reports. That lack of attention to the PDC's processes and

requirements is par for the course for Mr. Cero, who was already penalized for violating reporting deadlines and requirements in his role as treasurer of MISS the same year. *See* Case #82004.

I urge the PDC to conduct a review of these violations and impose penalties on both Councilmember Anderl for receiving contributions in excess of the statutory limit and MISS for exceeding the contribution limits to a municipal candidate for a single campaign year. Councilmember Anderl is currently running for re-election, and neither she nor Mr. Cero should be permitted to again flout Washington's contribution limits and reporting requirements during the 2021 campaign without penalty.

Sincerely,

A handwritten signature in black ink, appearing to read "RDE Jr", with a stylized flourish at the end.

7/6/2021

Richard D. Erwin, Jr.  
Washingtonians For Ethical Government