

Respondent Names
Complainant Name
Complaint Description
Conner Edwards reported via the portal 3 months ago (Sun, 21 Jul 2024 at 1:13 AM) Description of Complaint This candidate has been the subject of not one, but two warning letters: https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases?respondent=Lilliquist . Candidate failed to timely file multiple C3s showing significant activity. Like this C3 which should have been filed on 6/10/24 but wasn't filed until late July: https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110231417 Or this C3, which also should have been filed no later than 6/10/24 but wasn't filed until late July: https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110231415 This candidate also hasn't filed a C4 for the time period he has been fundraising for, even though it is required. Notice to Respondent I apologize to you for any inconvenience caused by this complaint. This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws. What are these shortcomings? Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate filers about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable

requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.

I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

"Be the change that you wish to see in the world."
— Mahatma Gandhi

What impact does the alleged violation(s) have on the public?

The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of committees and enforce filing requirements damages both the public and the candidates themselves.

List of attached evidence or contact information where evidence may be found

PDC Website.

List of potential witnesses with contact information to reach them

See respondent contact info on PDC website.

Certification (Complainant)

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.

MICHAEL W LILLIQUIST (Michael Lilliquist)

Candidate for CITY COUNCIL MEMBER for CITY OF BELLINGHAM in the 2025 election.

Overview

[Contributions](#)

[Expenditures](#)

[Pledges](#)

[Debts](#)

[Loans](#)

[Independent Expenditures](#)

Candidate Overview

Registered March 4, 2022

📍 PO Box 6091 Bellingham, 98227

✉ lilliquistforbellingham@gmail.com

Candidacy Status

➡ Candidate registered (3/4/2022)

Financial Overview

\$0.00	+	\$4,000.83	+	\$0.00	=	\$4,000.83
Starting balance		Contributions		Loans		Total raised

\$0.00

Total spent

\$0.00

Pledges

\$0.00

Debt

\$0.00

Independent expenditures for

\$0.00

Independent expenditures against

Candidate Reports and Forms

[Registration Form](#)

[Financial Affairs Report](#)

[Surplus Funds Account](#)

[Contributors and Vendors Map](#)

Made to candidate for 2025

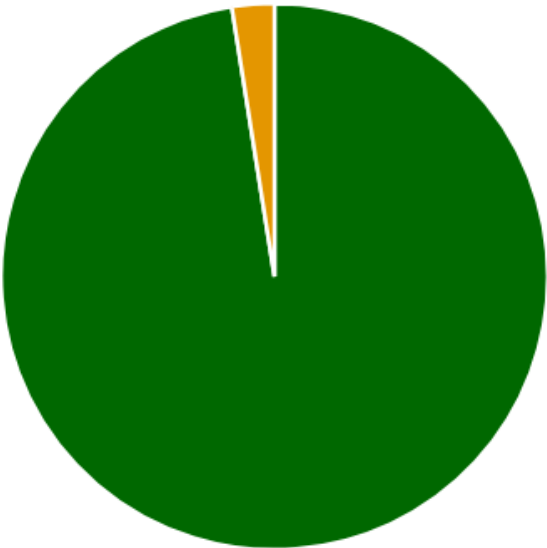
Contributions

See who has contributed cash and in-kind (non-monetary) contributions to the campaign.

Contributions made to candidate for 2025

Individual
\$3,900.83

Other
\$100.00



Made by candidate for 2025

Expenditures

See how the campaign has spent money, and what kind of goods and services it received as in-kind contributions.

No expenditures reported.

Candidates Filed for this Position

Show entries Search:

* declared candidates (eligible for election)

Candidate	Contributions	Expenditures
MICHAEL W LILLIQUIST (Michael Lilliquist)	\$4,000.83	\$0.00

Showing 1 to 1 of 1 entries

Spending for and against this candidate**Independent Expenditures**

Independent expenditures are made by third parties that are not part of a candidate's campaign.

No independent expenditures reported.

Incurred by candidate**Debts**

This information shows the debt for the campaign as of the submission date of the related report.

Outstanding debt for campaign is \$0.00

Campaign Finance Reports

See the reports filed by the candidate. Reports with a strikethrough were amended by another report.

Show entries

[Download 7 rows as CSV.](#)

Period	Report Number	Filed	Report	Form Type	Election Year
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Period	Report Number	Filed	Report	Form Type	Election Year
03/01/2022 - 03/01/2022	110231416	07/20/2024	View Report	C3	2025
03/01/2022 - 03/01/2022	110075189	03/04/2022	View Report	C3	2025
03/02/2022 - 03/02/2022	110231415	07/20/2024	View Report	C3	2025
03/02/2022 - 03/02/2022	110075190	03/04/2022	View Report	C3	2025
04/30/2024 - 04/30/2024	110231414	07/20/2024	View Report	C3	2025
05/15/2024 - 05/15/2024	110231417	07/20/2024	View Report	C3	2025
07/19/2024 - 07/19/2024	110231418	07/20/2024	View Report	C3	2025

Showing 1 to 7 of 7 entries

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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





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May 17, 2022

Delivered electronically to Michael Lilliquist at michaellilliquist@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Case 102574

Dear Mr. Lilliquist:

Below is a copy of an electronic letter sent to Glen Morgan concerning the above referenced complaint filed with the Public Disclosure Commission (PDC) against your 2017 campaign.

Pursuant to WAC 390-37-060(1)(d), this letter constitutes a formal written warning concerning your 2017 Campaign's failure to timely and accurately disclose contribution and expenditure activities. PDC staff expects you to file timely and accurate contribution and expenditure reports in the future. 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).

If you have questions, you may contact Erick Agina, Compliance Officer, at (360) 753-111, toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s/ Peter Lavallee

Peter Lavallee
Executive Director



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May 17, 2022

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Michael Lilliquist, PDC Case 102574

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its investigation of your complaint received on January 6, 2022, against Lilliquist for City Council. Your complaint alleged that Michael Lilliquist (Respondent), an incumbent city council member of City of Bellingham, may have committed violations of RCW 42.17A in the 2017 election year.

Your complaint alleged that the Respondent may have:

1. Failed to file accurate and timely Monetary Contribution (C-3) and Summary Full Campaign Contribution and Expenditure reports (C-4) – RCW 42.17A.235 and .240. You provided/attached four C4 reports to the complaint as evidence of the alleged violation.
2. Misappropriated campaign funds for personal use by not accounting for \$540.32 in campaign funds reported at the end of the campaign in 2017, but never carried forward and depicted as a carry forward from 2017 to the 2021 election/campaign year – RCW 42.17A.445 and WAC 390-16-238.

RCW 42.17A.235 and .240 require political candidates, single election political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Contributions are reported weekly during the same time period, and must be disclosed on Monday for contributions deposited during the previous seven days.

RCW 42.17A.445 requires that contributions received and reported by political candidates may only be expended for personal use under certain specific circumstances and reported to the Commission pursuant to RCW 42.17A.235 and .240.

WAC 390-16-238 states that expenditure of a candidate's campaign funds not directly related to the election campaign is a personal use of campaign funds prohibited under RCW 42.17A.445.

PDC staff reviewed your complaint, the response from the Respondent, and the reports filed by the respondent with the PDC.

As a result of the investigation, staff found the following:

Alleged failure to file timely C-3 and C-4 reports (RCW 42.17A.235). The complaint included four C-4 reports filed by the Campaign in 2017 to document the alleged violation(s).

- The complaint alleged: "It appears that on Lilliquist's last C-4 for his 2017 campaign for the Bellingham City Council (see PDC C4 #100803101 dated December 8, 2017) he showed a closing balance of \$540.32, yet on his beginning C4 for his 2021 campaign (see PDC C4 #110030999 dated 07/10/2021) he shows zero (\$0) for 'previous total cash and in-kind contribution.' What happened to the \$540.32 from his prior campaign?"
- In his responses to the complaint, the Respondent stated: "I am afraid that the ORCA reports may have been inaccurate or incomplete. I will admit that I am not skilled at accounting, and I did not understand very much about reporting via ORCA back in 2017. I relied on a volunteer, a local college student named Daniel Huang. I did not use ORCA myself, I did not verify all the reports, and Daniel filed the reports in my name. I say this not as an excuse for any mistakes, but only to explain why my grasp of the details is not specific or clear. I had assumed that my treasurer had filed all reports in a timely fashion, with a few cases of late filing and some amendments and corrections. I had assumed all was done and finalized, and the ORCA file for that year (2017) was closed." Michael Lilliquist further stated: "The actual disposition of the campaign funds is, I believe, best reflected in the bank account records, for (WECU) checking account for Lilliquist for City Council. The bank account shows different numbers, not surprisingly, based on timing of when check cleared. As the attached spreadsheet shows, at the end of November, the account held \$256.23, and after a final \$250 check cleared on 12/01/17, the account held a balance of \$6.32. See attached bank statements. At this point in 2017-18, I did not realize that the account would incur a \$5/month minimum balance fee, for falling below \$500. As a result, the account was (charge) \$5.00 on 12/31/17, 1/31/18, and 2/28/18, which left the account with a negative balance of -\$8.77. I paid off the debt myself, and closed the account. Again, see attached bank statements. So, contrary to Mr. Morgan's allegation that I 'took campaign money' and made it 'disappear' between campaigns, the account was drawn down to near zero with legitimate expenses, and I then I actually had to pay to close the account properly, after incurring additional bank fees."
- On March 31, 2022, the Respondent filed four late C-4 reports depicting how the \$520.32 was spent down by the Campaign, thereby accounting for how the \$520.32 was expended by the Respondent's campaign.

Alleged misappropriation of campaign funds for personal use by not accounting for \$540.32 in campaign funds – RCW 42.17A.445 and WAC 390-16-238. The complaint included four C-4 reports filed by the Campaign in the 2017 election year to document the alleged violation.

- Staff noted that the \$540.32 at issue in this matter was expended by the Respondent's campaign as opposed to being used for personal use. However, the Respondent's campaign failed to file the appropriate/pertinent statutory reports depicting how the amount was expended. The Respondent has since filed the reports depicting how his campaign expended the \$520.32 at issue in this matter.

Overall, the Respondent acknowledged and took responsibility for the deficiency in reporting/compliance, stating: "I will take this opportunity to say that I am embarrassed by the poor reporting, and I have learned a good lesson about trusting the job of reporting to a treasurer without understanding the reporting requirements myself."

Pursuant to WAC 390-37-060(1)(d), Michael Lilliquist will receive a formal written warning concerning his 2017 campaign's failure to file accurate and timely Monetary Contribution (C-3) and Summary Full Campaign Contribution and Expenditure reports (C-4) in the 2017 election year/campaign. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Since staff's investigation did not find evidence of violations warranting enforcement action beyond the Formal Written Warning described above, I am dismissing the remaining alleged violations in your complaint in accordance with WAC 390-37-070.

If you have questions, you may contact Erick Agina, Compliance Officer, at (360) 753-1111, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Peter Lavallee

Peter Lavallee
Executive Director

cc: Michael Lilliquist

