



State of Washington
PUBLIC DISCLOSURE COMMISSION
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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

PDC Case 141227

Lance Gurel,

Respondent.

Findings of Fact,
Conclusions of Law, and
Order Imposing Fine

Pursuant to the notice of brief enforcement hearing (brief adjudicative proceeding) sent to Lance Gurel on July 23, 2024, a brief adjudicative proceeding was held on August 29, 2024, remotely from Olympia, WA. The purpose of the hearing was to consider whether Lance Gurel violated RCW 42.17A.235 & .240 by failing to: (1) accurately identify monetary contributors; (2) disclose the candidate filing fee; and (3) include required descriptions for campaign expenditures on Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports).

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commissioner Allen Hayward was the Presiding Officer, and Commissioner J Robert Leach attended. The Commission staff was represented by Compliance Coordinators Jordan Campbell and Colin Peeples and Compliance Officer Jennifer Hansen. The Respondent did not participate in the hearing or provide written testimony.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. On January 16, 2020, Lance Gurel filed the Candidate Registration (C-1 report), selecting the “Full Reporting” option and listing Regan Glover as Treasurer.
2. On August 10, 2023, PDC staff received a complaint filed by Glen Morgan alleging that Lance Gurel had violated RCW 42.17A.235 and .240, by failing to: (1) accurately identify monetary contributors; (2) disclose the candidate filing fee; and (3) include required descriptions for campaign expenditures on Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports).
3. During the 2020 campaign, the Respondent submitted C-3 reports mis-identifying their online payment vendor ActBlue as the source of several monetary contributions. The Respondent also failed to disclose the candidate filing fee and failed to include the required detail for political advertising expenditures made by the campaign.

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. Lance Gurel violated RCW 42.17A.235 & RCW 42.17A.240 by failing to: (1) accurately identify monetary contributors; (2) disclose the candidate filing fee; and (3) include required descriptions for campaign expenditures on C-3 and C-4 reports.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED that the Respondent shall make corrections and file amendments to C-3 and C-4 reports previously filed for the 2020 election, within 30 days of this Order and is assessed a total civil penalty of \$300 in accordance with the Brief Enforcement penalty schedule set forth in WAC 390-37-143.**
2. **It is further ordered that \$150 of the \$300 penalty is suspended on the following conditions:**
 - a. **The non-suspended portion of the penalty (\$150) is paid by the Respondent within 30 days of the date of this Order.**

- b. The Respondent files all amended C-3 and C-4 reports for the 2020 election, within 30 days of this Order.**
- 3. It is further ordered that, if the Respondent fails to comply with any of the above conditions:**
 - a. The full \$300 penalty shall immediately become due without further action by the Commission and PDC Staff is directed to refer the matter to collections and/or commence other legal proceedings as authorized by RCW 42.17A and 390 WAC.**
 - b. Any missing campaign reports shall be due immediately.**

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 27th of September, 2024.

Public Disclosure Commission

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee

Executive Director

I, Jennifer Hansen, certify that I emailed a copy of this order to the Respondent at their respective email address of record.

Electronically Signed Jennifer Hansen

September 27, 2024

APPEALS OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).
- All requests for review must be submitted electronically to pdcc@pdcc.wa.gov **REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.**

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the FINAL ORDER. *See* WAC 390-37-142(7).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.