



**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@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

**Memorandum**

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: October 11, 2022

Subject: Citizens for Stanwood-Camano Schools Enforcement Hearing Memorandum:  
PDC Case #111937

**Allegations:**

PDC staff alleges that Citizens for Stanwood-Camano Schools, an April 26, 2022 special election committee, violated: (1) RCW 42.17A.205 for failure to file a Committee Registration statement (C-1pc report); and (2) RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the committee.

**Background:**

- Citizens for Stanwood-Camano Schools has been registered with the PDC at least four times in the past, during calendar years 2008, 2012, 2013 and 2017.
- The C-1pc submitted by Citizens for Stanwood-Camano Schools on May 3, 2013 listed John Russell as President.
- On April 26, 2022, PDC staff received a complaint filed by Tom Miller alleging that Citizens for Stanwood-Camano Schools, an April 26, 2022 special election committee, violated: (1) RCW 42.17A.205 for failure to file a Committee Registration statement (C-1pc report); and (2) RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the committee.

**[Exhibit A]**

- PDC staff sent notice of the complaint to two email addresses, [sondancinggirl@yahoo.com](mailto:sondancinggirl@yahoo.com) & [agpeshafer@msn.com](mailto:agpeshafer@msn.com) on April 28, 2022 and requested a response by May 12, 2022. **[Exhibit B]**
- When no response was received and no reporting was done, staff sent a second notice of the complaint to [sondancinggirl@yahoo.com](mailto:sondancinggirl@yahoo.com) & [agpeshafer@msn.com](mailto:agpeshafer@msn.com) on June 30, 2022 and requested a response by July 11, 2022. **[Exhibit B]**
- On July 21, 2022, PDC staff spoke to Kirsti Shafer Daniels, the person initially believed by the Complainant to be responsible for Citizens for Stanwood-Camano Schools. Per Ms. Shafer Daniels, Mr. John Russell was contacted as the likely responsible individual.
- After confirming with Mr. Russell that he was the person responsible for Citizens for Stanwood-Camano Schools, PDC staff sent notice of the complaint to [jrussellstanwood@icloud.com](mailto:jrussellstanwood@icloud.com) on July 22, 2022, and requested a response by August 8, 2022. **[Exhibit C]**
- On July 25, 2022, John Russell submitted a written response on behalf of Citizens for Stanwood-Camano Schools for PDC Case #107715. **[Exhibit D]**
- After conducting a preliminary review and assessment of the complaint filed by Tom Miller on April 26, 2022, PDC staff opened a formal investigation and held an Initial Hearing (Case Status Review Hearing) on July 25, 2022, pursuant to RCW 42.17A.755, and WACs 390-37-060 and 390-37-071. Mr. John Russell participated by telephone in the Initial Hearing and represented Citizens for Stanwood-Camano Schools. **[Exhibit E]**
- On August 17, 2022, staff received an email from Mr. Russell stating that he would be working on completing the missing reporting the following day. After no reporting was completed, staff sent a request for a response on August 30, 2022. **[Exhibit F]**
- On September 12, 2022, staff forwarded a letter from PDC General Counsel, Sean Flynn, noting additional enforcement action that would be taken if the missing reports were not completed. **[Exhibit G]**
- On September 29, 2022, PDC staff served John Russell, on behalf of Citizens for Stanwood-Camano Schools, by electronic mail, with a hearing notice for a Brief Adjudicative Proceeding to be held on October 20, 2022, concerning alleged violations of: (1) RCW 42.17A.205 for failure to file a Committee Registration statement (C-1pc report); and (2) RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the committee. **[Exhibit H]**

**Laws & Rules:**

**RCW 42.17A.205** requires that every political committee shall file a statement of organization with the commission and that the statement must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier.

**RCW 42.17A.235** and **RCW 42.17A.240** require committees to file timely, accurate reports of contributions and expenditures. Under the “Full Reporting” option, until five months before the election, C-3 and C-4 reports are required monthly when contributions exceed \$200 since the last report; on the twenty-first day and the seventh day preceding the date of the election date; and on the tenth day of the first month after the election date.

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**Exhibit List:**

- **Exhibit A** – PDC Case #107715; Citizens for Stanwood-Camano Schools Complaint; received April 26, 2022
- **Exhibit B** – Original Notice of Complaint; sent electronically on April 28, 2022 & Second Notice of Complaint; sent electronically on June 30, 2022
- **Exhibit C** – Notice of Complaint; sent electronically on July 22, 2022 to John Russell
- **Exhibit D** – Written Response from John Russell on behalf of Citizens for Stanwood-Camano Schools; received on July 25, 2022
- **Exhibit E** – Initial Hearing Notice (Case Status Review Hearing) After Opening a Formal Investigation, Citizens for Stanwood Camano Schools, PDC Case #107715
- **Exhibit F** – Email from John Russell; dated August 17, 2022 & PDC staff request for response; sent electronically on August 30, 2022
- **Exhibit G** – Letter from General Counsel, Sean Flynn; sent electronically on September 12, 2022
- **Exhibit H** – Brief Adjudicative Proceeding (Brief Enforcement Hearing) Notice; dated September 29, 2022

# EXHIBIT A

<b>Respondent Names</b>
Kirsti Shafer Daniels
<b>Complainant Name</b>
Thomas A. Miller
<b>Complaint Description</b>
<p><a href="#">Tom Miller</a>  reported via the portal  a day ago (Tue, 26 Apr 2022 at 2:38 PM)</p> <p>1 - Photo of PAC overall scorecard in fundraising, mailers, texts, ads, signs, # of volunteers, etc.  2 - Photo of Facebook Page header  3 - Photo of Facebook Page purpose, "YES" on prop 1 School Levy  4 - Photo of video on Facebook Page of Kirsti Shafer Daniels describing herself as "Co-chair" of the "YES" campaign, and stating that she is a school employee.  5 - Photo of video on Facebook Page of Natalie Hagglund, School Board President announcing her support for the "YES" vote to viewers.  6 - Photo of Facebook page owner Kirsti Shafer Daniels  7 - Photo of mail collection box with "YES" on Proposition 1 postcards to be mailed.  8 - Photo of Facebook Page with property tax breakdown information on levy.  9 - Photo of Facebook Page with sample of Facebook posting done during business hours on weekday.  10 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  11 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  12 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  13 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  14 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  15 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  16 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  17 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.  18 - Photo of Facebook page with sample of Facebook posting done during business hours on weekday.</p> <p>-----</p> <p><a href="#">Tom Miller</a></p>

Tue, 26 Apr 2022 at 6:16 PM

Good evening,

My daughter who also lives in the Stanwood Camano School District boundaries received this unsolicited text this evening from the same PAC, based on their logo and campaign slogan. Interestingly, we did not receive any such text, however, our daughter has a child enrolled in the District. Has Ms. Daniels appropriated confidential parent data and used it for this unregistered PAC for their text campaign? It appears so.

---

[Tom Miller](#)

Wed, 27 Apr 2022 at 7:25 AM

Good morning,

I received additional photos early this morning that were taken from the Citizens for Stanwood Camano School PAC facebook page, and are attached here. These photos mention thanking the SCEA, or Stanwood Camano Education Association (teacher's union), and show staff and a school administrator who appear to be in a classroom environment working on the PAC mailers. The Administrator is identified as Ryan Ovenell, a High School Principal, please add him to the witness list. He appears to be sharing a list of names with another member of the PAC. Is this a list obtained from school records?

Finally, please add the Stanwood Camano Education Association President, Nyda Goldstein, to the witness list as they are mentioned in this one photo as participating with the PAC. Did they also contribute money?

Thank you -  
Tom Miller

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

Kirsti Shafer Daniels operated a political action campaign under the name "Concerned Citizens for Stanwood Camano Schools", and acted as Co-Chair with other unknown respondents. This PAC raised more than \$7,000 in 10 weeks, as well as purchased newspaper advertising and sending out thousands of mailers via USPS in support of the Stanwood Schools special election levy proposition 1 on April 26, 2022. Further. Ms. Daniels failed to file organization documents with the PDC as required by law, identify committee members and/or a treasurer, nor did she file any of the required monthly financial disclosure documents. In addition to this, she operated a Facebook page solely for the purpose of supporting the levy, identified as "Citizens for Stanwood Camano Schools", which included photographic evidence of their fundraising and PAC activities, as well as postings with time stamps during normal business hours that were apparently done on school premises (Ms.

Shafer works in the Office of the School Superintendent). It appears that The Superintendent, Dr. Deborah Rumbaugh, either knew, or should have known about Ms. Shafer's activities under RCW 42.17A.555, and either endorsed or quietly condoned these actions. The PDC should also be aware that the School Board President, Natalie Hagglund, posted videos on Ms. Daniels Facebook page for the Schools endorsing the proposition, and may be involved as a defacto co-chair or PAC organizer. Ultimately, it appears that there was collusion between the Board President, the Superintendent, and the District employee here to run and operate a PAC without registering or complying with any PDC laws, and using District facilities and employees in order to avoid regulation and advance their cause for a "yes" vote.

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

Multiple photos of screen shots have been collected from the "Citizens for Stanwood Camano Schools" Facebook page and are attached. The direct website address is:  
<https://www.facebook.com/CitizensForStanwoodCamanoSchools>

**List of potential witnesses with contact information to reach them**

- 1) Ms. Kirsti Shafer Daniels,
- 2) Dr. Debbie Rumbaugh,
- 3) Ms, Natalie Hagglund,
- 4) Unknown "Co-Chair(s)" of the Citizens for Stanwood Camano Schools

**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.

8:16



[Done](#)

[Edit](#)

Committee these last 10 weeks. we gave  
1000% to pass this Levy.

Deep breath for tomorrow ❤️

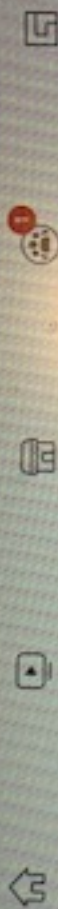
**Citizens for Stanwood Camano Schools:**

- \* 47 Volunteers
- \* 10 weeks of Huddles
- \* 2398 handwritten and stamped postcards
- \* 4579 Text messages
- \* 2 sets of signage: Terry's Corner and 532  
(with additional days added!)
- \* 8 letters to the Editor
- \* Over \$7000 raised
- \* On FB:
  - between 20-30 specialized FB posts/Ads run
  - Over 31,660 people reached
  - Over 12,335 post engagements
  - Over 80 new page likes
- \* SC News ad - seen by at least 4000 people  
(regular subscribers)
- \* Pro statements for the voters guide
- \* (Many!) Community meetings and  
conversations
- \* And so many more ways that each of you have  
served!



[More](#)





**Citizens for Stanwood  
Camano Schools**

@CitizensForStanwoodCamanoSchools  
Community

 Send message

Hi! Please let us know how we can help.

Like


♂

...

## About

1900

- 1 Citizens for Stanwood Camano Schools
- 1 Citizens for Stanwood Camano Schools is a citizens group which supports the Stanwood Camano School District in Stanwood, WA. The main goal is to prov... See more

 1,349 people like this including 9 of your friends



✓ 1,381 people follow this

 Send message


Community

Create post

 Photo/Video

 Check in

 Tag friends



Citizens for Stanwood Camano Schools

Every vote counts.  
Even if you support our schools, if you have voted yes for every other  
Levy....if you don't drop that YES ballot off today by 8pm, it can't help  
us win. Every. Vote. Counts.  
And we have 4655 reasons that they should!

## Photos

See all





... of a Page. See who manage and

ber 27, 2011

tion: United States

Like

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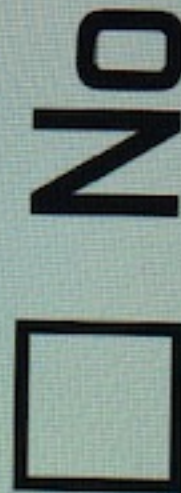
Like Reply 2d



Citizens for Stanwood Camano Schools

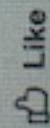
April 22 at 4:44 AM · 🌐

Mark Yes! for our schools - our students count, so does your vote!!  
Ballots are due by 8pm April 26th!!



Carrie Kennedy and 15 others

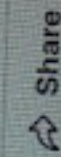
2 Comments



Like



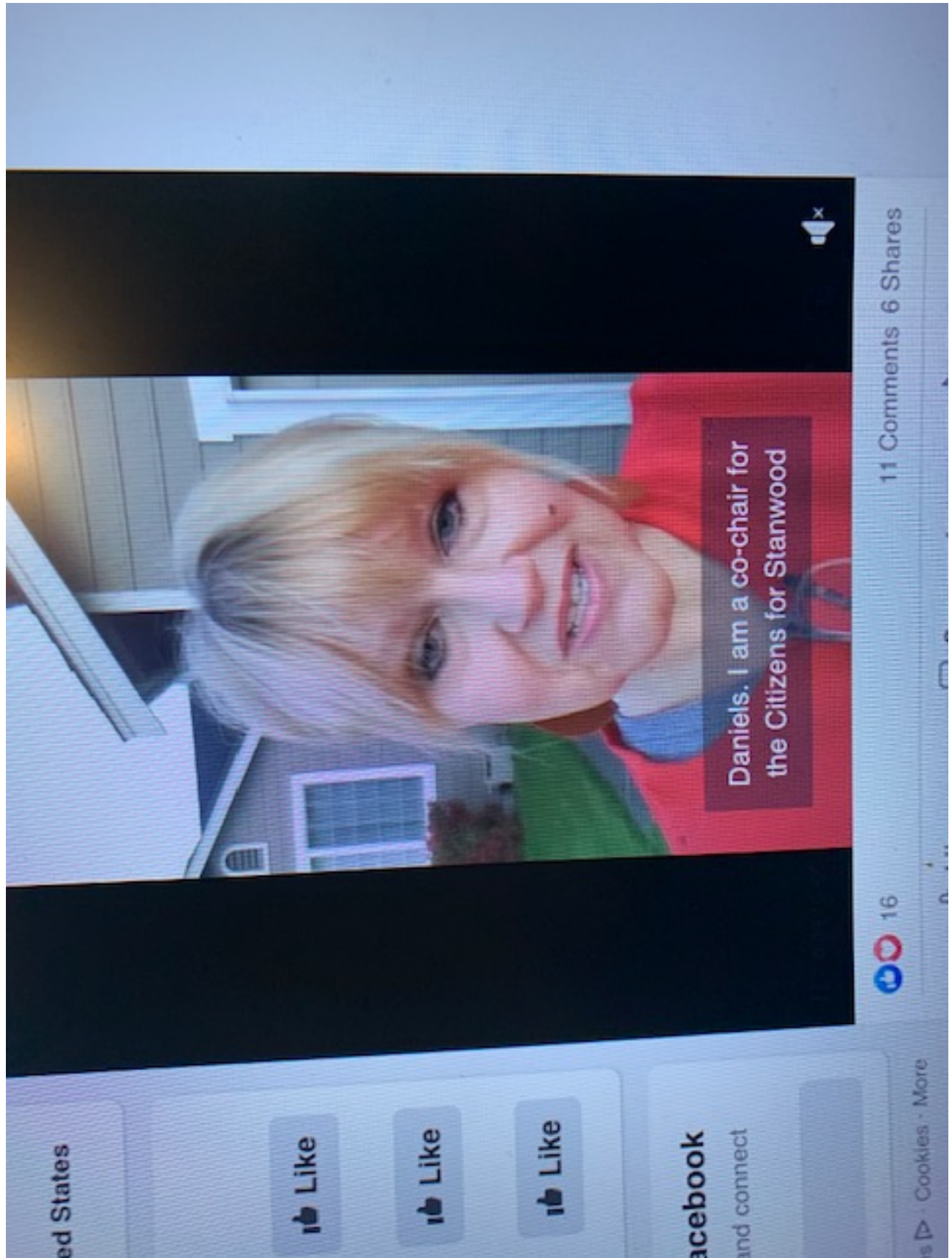
Comment



Share

Most relevant ▾

Write a comment










write a comment...

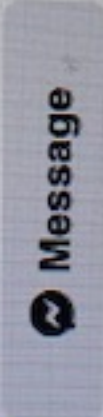
Kirsti Shafer Daniels

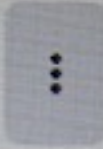
**Kirsti Shafer Daniels**

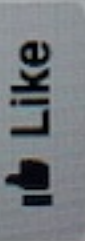
 3 mutual friends including **Will Annie Bowden and Brooke Wyles**


 From Troutdale, Oregon

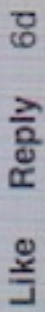
 **Add Friend**

 **Message**



 ...

 **Like**

 **Like**

 **Like** **Reply** 6d

**View 1 more comment**

 **Citizens for Stanwood Camano Schools**  
April 8 at 3:51 PM · 

Three more amazing letters of support from our Community



View 1 more comment



**Citizens for Stanwood Camano Schools** updated their cover photo.

...

April 3 at 6:12 AM · 🌐





[View 3 more comments](#)



### Citizens for Stanwood Camano Schools

April 11 at 4:17 PM · 🌐

Where does all the money for schools on your property tax statement go? It is a reasonable question - how much of those tax dollars stay in our local district? As I look at my own tax statement (Island County) it takes some careful thought about what all these line items are: State School, State School part 2, School 205-401 Bond, School 205-401 CP and School 205-401 Enrichment. In my case, this amounts to about 63% of my total property taxes and would be about 57% if I li...

[See more](#)



👍 14

5 Comments 7 Shares

👍 Like

💬 Comment

➦ Share

More

Most relevant ▼





## Citizens for Stanwood Camano Schools

April 8 at 4:01 PM · 🌐

...

Ballots are arriving! Please vote YES for our schools, we can give you 4655 reasons why you should!

**WE CAN GIVE YOU 4,655 REASONS TO VOTE**

**YES** REPLACEMENT CAPITAL PROJECTS AND TECHNOLOGY LEVY

Remember to vote by APRIL 26, 2022

**SCHOOLS NEED YOUR YES VOTE!**

**At the Camano Annex**  
121 N. East Camano Drive

**Behind Stanwood Library**  
9701 271st St NW

Official Ballot Drop Box

Ballot Drop Box

👍 16

2 Comments 13 Shares

👍 Like

💬 Comment

➦ Share

More

Most relevant



View 1 more comment



## Citizens for Stanwood Camano Schools

April 8 at 3:51 PM · 🌐

...

Three more amazing letters of support from our Community!  
THANK YOU!!!

# LETTERS TO

## School levy is a wise investment

Dear Editor,

Please support our Stanwood-Camano schools. Levy dollars pay for needed facility improvements and maintenance that otherwise will not happen

educator and administrator who recently served as a Stanwood-Camano School Board director, I can tell you that the district is the best managed I've ever seen. We have outstanding teachers and staff. Let's not let them or our kids down.

Chad Lewis

Dear Editor,

For 10 years I wrote a column in this newspaper titled "Life Goes On," highlighting different aspects of living — and teaching — in Stanwood-Camano, including the 70 years I taught at Stanwood High.

Prior to Stanwood, I taught at a school district plagued with five levy failures in six years. The school had no lunch program, just four food dispensers. We didn't have enough copying paper. Kids had to share books. We had only one custodian.

Retired since 2007, I have been shocked at the Letter to the Editor urging people to vote against the levy. My husband and I have lived on a fixed income retiring, and believe me, trips to the store and gas station are appalling.

But I still would never short-change youth. I toured the new Stanwood High, and it is breathtaking. We cannot let it go to ruin for lack of funds. We are just beginning to come out of a two-year pandemic, and kids have been traumatized. And now some people want to take money away from kids' education? I



For wood sheds, Am Can a dirt Stan bikes

rewards (junk.) The recently

## Support the levy and local control

Dear Editor,

Do you want local control for school district funding?

Our Stanwood-Camano School District faces a challenge to pass a levy including capital projects for school buildings.

Our state does not provide districts with regular capital project funding for school building care. This funding comes through passing local levies, replacing expired levies because school buildings need care for life.

If we don't pass levies, our district will react and prioritize by urgency. Reacting costs more in the long run.

Furthermore, if levies aren't passed will then provide fuel for the state to take over future capital project funding? If the McCleary decision is expanded to include capital projects, a statewide tax will be imposed. Is there much to be said for that?

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Citizens for Stanwood Camano Schools

📩 Send message

More



↳ 1 Reply



## Citizens for Stanwood Camano Schools

March 28 at 3:10 PM · ⚙

A few more reasons to vote YES..... ❤️❤️❤️



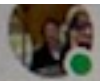
## Stanwood-Camano School District

March 28 at 12:59 PM · ⚙

Saratoga School teacher Rebecca Buller and Technology TOSA (Teacher on Special Assignment) Lynn Devora-McNabb recently







Write a comment...



## Citizens for Stanwood Camano Schools

March 29 at 3:35 PM · 🌞

Thank you Frank Schmidt, John Russell and Stuart Heady for your support of our District!



ore

18

1 Share







View 4 more comments



**Citizens for Stanwood Camano Schools**

April 1 at 3:24 PM · ⚙

...

## REPLACEMENT CAPITAL PROJECTS AND TECHNOLOGY LEVY

**Stanwood Camano**  
School District

The levy would  
continue to provide  
the tools needed to  
support robotics at  
the high school.



Learn more at [www.stanwood.wednet.edu/levy](http://www.stanwood.wednet.edu/levy)

**PLEASE REMEMBER TO VOTE BY APRIL 26**

**Stanwood-Camano School District**

April 1 at 3:06 PM · ⚙

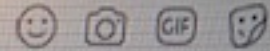
The Replacement Levy funds learning tools to support the robotics and engineering programs in our schools. Students are able to take the designs they have creat... **See more**

More





Write a comment...



**Citizens for Stanwood Camano Schools**

April 5 at 9:54 AM · 🌞



## WHAT HAPPENS IF THE LEVY DOESN'T PASS?

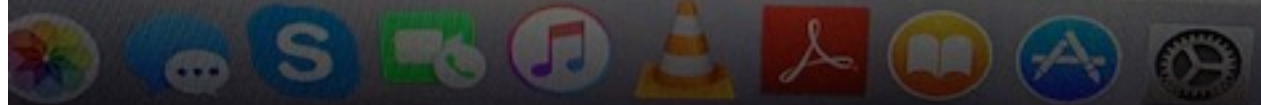
By law, the levy could not be considered again until 2023, and the district would lose \$2.5 million in annual funding for student learning programs and devices.

Needed facility improvements, such as new roofs and boilers would be delayed.



👍 2

1 Share





Like Reply 2w



## Citizens for Stanwood Camano Schools

April 6 at 9:24 AM · ⚙



## Stanwood-Camano School District

March 28 at 8:10 PM · ⚙

This is our "Why."

In this video, learn more about how students are using multim  
and robotic technology in schools and about capital projects  
funded by the... **See more**

Dedicated to the Success  
of Every Student

**Stanwood**  **Camano**  
★ ★ ★ School District

YOUTUBE.COM

**Stanwood-Camano School District Replacement Capital  
Projects and Technology Levy**





Stuart Heady

Thanks for putting this together. Very helpful.

Like Reply 1w



Citizens for Stanwood Camano Schools

April 12 at 12:28 PM



What this Levy is all about!!



Stanwood-Camano School District

April 11 at 7:05 PM

In our recent video about the Replacement Capital Projects and Technology Levy, first graders in Laura Laures' technology class at Twin City Elementary were wor... [See more](#)

13

8 Comments 3 Shares





schools will struggle with a distinct disadvantage relative to communities that do s... [See more](#)

Like Reply 1w



View 1 more comment



**Citizens for Stanwood Camano Schools**

April 12 at 4:05 PM · ⚙

...

Thank you Windermere Stanwood Camano!



**Learn more about  
the Capital Projects &  
Technology  
Replacement Levy**



More

4:53



+1 (833) 936-3024 >

Text Message  
Thu, Apr 14, 5:03 PM



Citizens for Stanwood Camano  
Schools Vote YES for our schools  
and our students! Ballots are due  
by 8 pm Tuesday, April 26, 2022

Text STOP to end



Done

Edit

Home

Posts

Videos

Photos

Community

Ev



# Citizens for Stanwood Camano Schools



Mar 28 · ⚙️

A big THANK YOU to SCEA, District staff and Community members for giving your time and penmanship to our Levy!! 3988 postcards were signed, addressed and stamped tonight to go out next week as a reminder to VOTE YES for our schools!



30

2 Comments 9 Shares



Send message



Hi! Please let us know how we can help.

More



6:07



Done

Edit



## Citizens for Stanwood Camano Schools

Mar 28 · ⚙

More

# EXHIBIT B

**Jordan Campbell**

replied

*5 months ago (Thu, 28 Apr 2022 at 3:11 PM)*

To: sondancinggirl@yahoo.com

Cc: agpeshafer@msn.com

Hello Citizens for Stanwood Camano Schools,

The Public Disclosure Commission received a complaint from Thomas A. Miller on April 26, 2022, which has been assigned PDC Case Number 107715. The Complaint alleges the following:

- Alleged violation of RCW 42.17A.205, .235 & .240 for failure to register as a political committee and report contributions & expenditures.

Please review the attached complaint and provide your response by **April 12, 2022**.

If you determine there is a need to file or amend reports as part of this case, you may review our guides and instructions at the website (<https://www.pdc.wa.gov/registration-reporting>).

If further assistance filing or amending reports beyond the guides and videos is needed, please reply to this message with a request to be assigned a Filer Assistance Specialist so that you receive timely and coordinated guidance.

For more information about the enforcement process, please see our [Enforcement Guide](#).

If you have any questions, please reply to this email.

Thank you,

PDC Staff  
Public Disclosure Commission  
PDC@pdc.wa.Gov  
360-753-1111



**Jordan Campbell**

replied

*5 months ago (Thu, 28 Apr 2022 at 3:16 PM)*

To: sondancinggirl@yahoo.com

Cc: agpeshafer@msn.com

Citizens for Stanwood Camano Schools,

Please excuse any confusion, the date for you to provide a response is **May 12, 2022, not April 12, 2022**. Once again, apologies for any confusion this may have caused.

**Jennifer Hansen**

replied

*3 months ago (Thu, 30 Jun 2022 at 9:27 AM)*

To: sondancingirl@yahoo.com

Cc: agpeshafer@msn.com

Hello Citizens for Stanwood Camano Schools,

**As of today, no response or registration has been submitted by Citizens for Stanwood Camano Schools. This email request is being sent with a request to respond immediately.**

The Public Disclosure Commission received a complaint from Thomas A. Miller on April 26, 2022, which has been assigned PDC Case Number 107715. The Complaint alleges the following:

- Alleged violation of RCW 42.17A.205, .235 & .240 for failure to register as a political committee and report contributions & expenditures.

Please review the attached complaint and provide your response by **Monday, July 11, 2022**.

If you determine there is a need to file or amend reports as part of this case, you may review our guides and instructions at the website (<https://www.pdc.wa.gov/registration-reporting>).

If further assistance filing or amending reports beyond the guides and videos is needed, please reply to this message with a request to be assigned a Filer Assistance Specialist so that you receive timely and coordinated guidance.

For more information about the enforcement process, please see our [Enforcement Guide](#).

If you have any questions, please reply to this email.

Please note that further enforcement action may occur for failure to register and report political committee activity. Please register and report. We have staff available to assist you with registration and filing obligations.

Thank you for your prompt attention.

Jennifer Hansen (she/her)  
Compliance Officer  
Public Disclosure Commission  
[pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

1.360.586.4560

**\*\*Please click Reply when responding to this email**

# EXHIBIT C



**Jennifer Hansen**

replied

*3 months ago (Fri, 22 Jul 2022 at 5:07 PM)*

To:jrussellstanwood@icloud.com

Mr. Russell:

Thank again for speaking to me earlier today. As noted, here is the information about the complaint.

The Public Disclosure Commission received a complaint from Thomas A. Miller on April 26, 2022, which has been assigned PDC Case Number 107715. The Complaint alleges the following:

- Alleged violation of RCW 42.17A.205, .235 & .240 for failure to register as a political committee and report contributions & expenditures.

Please review the attached complaint and provide your response by **Monday, August 8, 2022**.

If you determine there is a need to file or amend reports as part of this case, you may review our guides and instructions at the website (<https://www.pdc.wa.gov/registration-reporting>).

If further assistance filing or amending reports beyond the guides and videos is needed, please reply to this message with a request to be assigned a Filer Assistance Specialist so that you receive timely and coordinated guidance.

For more information about the enforcement process, please see our [Enforcement Guide](#).

If you have any questions, please reply to this email.

Please note that further enforcement action may occur for failure to register and report political committee activity. Please register and report. We have staff available to assist you with registration and filing obligations.

Thank you for your prompt attention.

Jennifer Hansen (she/her)  
Compliance Officer  
Public Disclosure Commission  
[pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

1.360.586.4560

**\*\*Please click Reply when responding to this email**

# EXHIBIT D

Dear PDC,

I appreciate this opportunity to explain who we are and why I believe that that complaint is invalid. Although I understand that today's hearing is not judiciary hearing do understand that this letter may become part of the public record on this complaint.

Citizens for Stanwood-Camano Schools was formed, I believe about 8 years ago, shortly before I became its Chair. I current hold physical records back to 2014.

Formed to be an advocate for students in our community our primary purposes is to function as a political action in the support of levies and bonds proposed by the Stanwood-Camano School District.

The committee has been made up over the years by various volunteers in the community. I have remained in a leadership role to provide continuity and institutional knowledge. I have never served as treasurer, instead relying on volunteers to take over that role.

Activities of the committee worked in ebbs and flows depending on the upcoming schedule of elections. The Stanwood-Camano School District published well in advance their schedule for levies and bond as part of their financial planning. This was disseminated regularly to the community.

As best we could we tried to file and maintain ourselves as an ongoing group rather than organizing and disbanding between elections. We thus tried to keep our corporate filing, in which we described ourselves as a PAC with the state current, and we tried to maintain our filings with the PDC.

Unfortunately, with volunteer groups sometimes things fall through the cracks. During the election for the Bond the treasurer at the time didn't complete the filings. When the file box was handed over to a new treasurer the instructions weren't given at PDC filings. Three treasurers down the road, with a two hiatus from in-person meetings led to gap I am immediately trying to remedy with my limited ability.

All accounting, including record of donations, deposits, and expenditures are intact and even available for outside review. I currently hold them in my possession. I am trying to start today to upload into the ORCA system.

My tardiness has been nothing more than my procrastination to sit down and do the work.

I maintain that we have always identified ourselves as Political Action Committee and past documentation supports that. We need to bring our filings up to date so that the PDC can make a fair decision on the consequences for delinquent filings, although we are hoping for a measure of leniency. We feel confident we can show that there was no intent at deception nor

were we trying to gain any advantage in any election in which we participated.

Thank you for your time and consideration.

John Russell

Chair – Citizens for Stanwood-Camano Schools

# EXHIBIT E



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@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

July 22, 2022

PDC Case: 107715

Sent electronically to Cit for Stanwood Camano Schools at [jrussellstanwood@icloud.com](mailto:jrussellstanwood@icloud.com)

**Notice for Initial Hearing (Case Status Review Hearing)**

Respondent: Cit for Stanwood Camano Schools  
Hearing/meeting date: July 25, 2022  
Time: 3:30 p.m.  
Place: Remotely via Teams  
Live Audio/Online Transmission

PDC Staff: Peter Lavalley, Executive Director, Public Disclosure Commission  
Authority: RCW 42.17A.755(3) & WAC 390-37-071

This is to notify you that the Public Disclosure Commission (PDC) has opened a formal investigation, and on the above date, PDC Staff will conduct an Initial Hearing (Case Status Review Hearing) concerning a complaint filed April 26, 2022 by Tom Miller. The complaint alleges that Citizens for Stanwood Camano Schools, may have violated RCW 42.17A.205, .235 and .240 for failure to register and report as a political committee.

The Case Status Review Hearing is not an adjudicative proceeding. It is conducted in accordance with WAC 390-37-071, and is intended to provide you with information concerning the investigative process, including possible alternatives to resolve the matter.

Cit for Stanwood Camano Schools  
Initial Hearing Notice (Case Status Review Hearing Notice)  
Page 2

You are not required to participate in the hearing. Further, your failure to participate will not prejudice your rights concerning the investigative process, or any potential future adjudicative proceeding in the matter.

If you wish to participate by telephone, please contact Jennifer Hansen, Compliance Officer at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

*Electronically signed*  
Peter Lavalley  
PDC Executive Director

# EXHIBIT F



**Jrussellstanwood**

replied

*2 months ago (Wed, 17 Aug 2022 at 1:29 PM)*

To:"PDC Support" <pdcc@pdc.wa.gov>

External Email

Thank you,

Yes. I will be sitting down to look at it first thing tomorrow (Thursday) I may need to reach out to your for assistance.

John Russell

[jrussellstanwood@icloud.com](mailto:jrussellstanwood@icloud.com)

(425) 344-6679

**Jennifer Hansen**

replied

*a month ago (Tue, 30 Aug 2022 at 2:49 PM)*

To:jrussellstanwood@icloud.com

Mr. Russell:

I am checking in on your progress regarding the reporting for the April 2022 special election. Colin Peeples has a message from you dated August 17, 2022 where you indicate that you would be working on the reporting the next day.

I don't see any notable progress. Please respond to this email with a date in which the reporting will be complete.

Please note that additional enforcement action may occur if no action is taken.

Thank you for your prompt attention.

Jennifer Hansen (she/her)

Compliance Officer

Public Disclosure Commission

[pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

1.360.586.4560

**\*\*Please click Reply when responding to this email**

# EXHIBIT G

[Jennifer Hansen](#)

replied

*a month ago (Mon, 12 Sep 2022 at 10:59 AM)*

To:jrussellstanwood@icloud.com

September 12, 2022

Sent to John Russell on behalf of Citizens for Stanwood-Camano Schools

Subject: Complaint filed against Citizens for Stanwood-Camano Schools, PDC Case 107715

Dear John Russell:

After conducting a preliminary review and assessment of a complaint filed April 26, 2022 by Tom Miller, PDC staff opened a formal investigation and held an initial hearing, on July 25, 2022. PDC staff made numerous email and telephone requests of your April 2022 Campaign for information to help resolve this matter.

To date, none of the requested information has been submitted on C-3 or C-4 reports and no current registration has been filed. The last email response from you, dated Wednesday, August 17, 2022, indicated that you would be working on the reporting the next day, Thursday, August 18, 2022. Since that date, PDC staff has sent an email on August 30, 2022, requesting a response and a second email on August 31, 2022, offering assistance to you. There has been no additional communication from you after your August 17, 2022 email.

PDC staff is making one last request for information. Please register your April 2022 special election campaign and file the missing campaign finance reports as requested for PDC Case 107715 no later than the close of business on **Friday, September 30, 2022**.

If you fail to provide the requested information by the above date, the PDC will refer this matter to the Office of the Attorney General to issue an investigative subpoena on behalf of the PDC and take all action necessary to enforce such subpoena.

If you have any questions please contact Jennifer Hansen, PDC Compliance Officer, by email at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov) attn: Case 107715.

Sincerely,

s/

\_\_\_\_\_  
Electronically Signed Sean Flynn, General Counsel  
Public Disclosure Commission

# EXHIBIT H



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@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

September 29, 2022

Delivered electronically to John Russell at "jrusellstanwood@icloud.com"

Subject: Citizens for Stanwood-Camano Schools; PDC Case Number 107715

The Public Disclosure Commission (PDC) is investigating a complaint filed on April 26, 2022 by Tom Miller. The complaint alleges that Citizens for Stanwood-Camano Schools, an April 26, 2022 special election committee, may have violated: (1) RCW 42.17A.205 for failure to file a Committee Registration statement (C-1pc report); and (2) RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the committee.

In accordance with RCW 42.17A.110 and RCW 42.17A.755, a Brief Adjudicative Proceeding (Brief Enforcement Hearing) has been scheduled to determine if Citizens for Stanwood-Camano Schools violated RCW 42.17A.205 by failing to file a C-1pc report and RCW 42.17A.235 & .240 by failing to timely and accurately file C-3 and C-4 reports. Under the Brief Enforcement Hearing rules, the Presiding Officer has the authority to assess a civil penalty in accordance with WAC 390-37-143, a penalty schedule adopted by the Commission (see enclosed copy).

**BRIEF ENFORCEMENT HEARING NOTICE**

Date and time: Thursday, October 20, 2022 at 1:00 p.m.  
Place: Remotely from Olympia  
Live Audio and Online Transmission  
Presiding Officer: Public Disclosure Commission  
Authority: RCW 42.17A and WAC 390

You are not required by law to attend the hearing. However, the Public Disclosure Commission recommends that respondents appear whenever possible.



## **PARTICIPATING VIA MICROSOFT TEAMS**

The Enforcement Hearing will be audio and video recorded. Some Commission members and staff will be in-person at the PDC office in Olympian and some will join the meeting remotely.

**PLEASE READ THE ENTIRE INSTRUCTION Prior to joining the meeting**

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### **How to participate remotely in the Washington State Public Disclosure Commission Meeting on October 20, 2022:**

Please note you may be prompted to download MS TEAMS App or use a supported browser: Microsoft Edge  or Chrome  for best performance.

#### **Participation Remote via MS Teams**

On the date of the meeting and at the designated agenda time you will Join:

#### **Microsoft Teams meeting info for October 20, 2022**

Join on your computer or mobile app [Click here to join the meeting](#)

Please remember to **Mute** yourself and turn your **camera off** when you are not talking.

If you experience technical difficulties with the MS Teams participation after the meeting has started at 1:00 p.m., call the PDC's main number 1-360-753-1111 and staff will try to assist you.

If you have any questions about the hearing process prior to the hearing date, please contact Jennifer Hansen by email at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Jennifer Hansen  
PDC Compliance Officer

Enclosure

**WAC 390-37-143 Brief enforcement hearings (brief adjudicative proceeding)—Penalty schedule.** The presiding officer may assess a penalty up to one thousand dollars upon finding a violation of chapter 42.17A RCW or Title 390 WAC.

(1) Base penalty amounts:

<b>Violation</b>	<b>1st Occasion</b>	<b>2nd Occasion</b>	<b>3rd Occasion</b>
<b>Failure to timely file an accurate and complete statement of financial affairs (F-1):</b>			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
<b>Candidate's failure to timely file an accurate and complete registration statement (C-1)/statement of financial affairs (F-1):</b>			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150 per report	\$150 - \$300 per report	\$300 - \$600 per report up to \$1,000
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150 per report	\$300 per report	\$600 per report up to \$1,000
Failed to file report by date of enforcement hearing.	\$250 per report	\$500 per report	consideration by full commission
<b>Failure to timely file an accurate and complete lobbyist monthly expense report (L-2):</b>			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
<b>Failure to timely file an accurate and complete lobbyist employer report (L-3):</b>			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
<b>Failure to timely file accurate and complete disclosure reports:</b>			
Political committee registration (C-1pc).	\$150	\$300	\$600
Statement of contributions deposit (C-3).	\$150	\$300	\$600
Summary of total contributions and expenditures (C-4).	\$150	\$300	\$600
Independent expenditures and electioneering communications (C-6).	\$150	\$300	\$600
Last minute contribution report (LMC).	\$150	\$300	\$600
Out-of-state committee report (C-5).	\$150	\$300	\$600
Annual report of major contributors (C-7).	\$150	\$300	\$600
<b>Failure to timely file accurate and complete reports disclosing lobbying activities:</b>			
Lobbyist registration (L-1).	\$150	\$300	\$600
Public agency lobbying report (L-5).	\$150	\$300	\$600
Grass roots lobbying report (L-6).	\$150	\$300	\$600

<b>Violation</b>	<b>1st Occasion</b>	<b>2nd Occasion</b>	<b>3rd Occasion</b>
Failure to file electronically.	\$350	\$650	\$1,000
Exceeding contribution limits.	\$150	\$300	\$600
Exceeding mini reporting threshold.	\$150	\$300	\$600
Failure to comply with political advertising sponsor identification requirements.	\$150	\$300	\$600
Failure to include required candidate's party preference in political advertising.	\$150	\$300	\$600
Failure to comply with other political advertising requirements, RCW 42.17A.330 through 42.17A.345.	\$150	\$300	\$600
Use of public facilities to assist a campaign for election or promote a ballot measure.	\$150	\$300	\$600
Treasurer's failure to timely file an accurate and complete annual treasurer's report (T-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000

"Occasion" means established violation. Only violations in the last five years will be considered for the purpose of determining second and third occasions.

(2) In determining the appropriate penalty, the presiding officer may consider the nature of the violation and aggravating and mitigating factors, including:

(a) Whether the respondent is a first-time filer;

(b) The respondent's compliance history for the last five years, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;

(c) The respondent's unpaid penalties from a previous enforcement action;

(d) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period, or otherwise had a significant or material impact on the public;

(e) The amount of financial activity by the respondent during the statement period or election cycle;

(f) Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;

(g) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention;

(h) Good faith efforts to comply, including consultation with PDC staff prior to initiation of enforcement action and cooperation with PDC staff during enforcement action, and a demonstrated wish to acknowledge and take responsibility for the violation;

(i) Personal emergency or illness of the respondent or member of his or her immediate family;



(j) Other emergencies such as fire, flood, or utility failure preventing filing;

(k) Sophistication of respondent or the financing, staffing, or size of the respondent's campaign or organization; and

(l) PDC staff, third-party vendor, or equipment error, including technical problems at the agency preventing or delaying electronic filing.

(3) The presiding officer has authority to suspend all or a portion of an assessed penalty under the conditions to be determined by that officer including, but not limited to, payment of the nonsuspended portion of the penalty within five business days of the date of the entry of the order in that case.

(4) If, on the third occasion, a respondent has outstanding penalties or judgments, the matter will be directed to the full commission for consideration.

(5) The presiding officer may direct a matter to the full commission if the officer believes one thousand dollars would be an insufficient penalty or the matter warrants consideration by the full commission. Cases will automatically be scheduled before the full commission for an enforcement action when the respondent:

(a) Was found in violation during a previous reporting period;

(b) The violation remains in effect following any appeals; and

(c) The person has not filed the disclosure forms that were the subject of the prior violation at the time the current hearing notice is being sent.

[Statutory Authority: RCW 42.17A.110(1) and 2018 c 304. WSR 18-24-074, § 390-37-143, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW 42.17A.110(1) and 42.17A.570. WSR 18-10-088, § 390-37-143, filed 5/1/18, effective 6/1/18. Statutory Authority: RCW 42.17A.110. WSR 17-03-004, § 390-37-143, filed 1/4/17, effective 2/4/17.]