



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 • Website: www.pdcca.wa.gov

October 28, 2022

Sent electronically to Mary Ann Mulloy-White, former Treasurer for Bethel Citizens for Schools Committee

Subject: Complaint filed by Connor Edwards, PDC Case 111247

Dear Mary Ann Mulloy-White:

Enclosed is a copy of an electronic letter sent to Connor Edwards concerning a complaint he filed on August 2, 2022, against the Bethel Citizens for Schools Committee (Committee), a local school bond and levy committee registered with the PDC. The complaint alleged that the Committee violated RCW 42.17A.235 and .240 by failing to timely disclose contribution and expenditure activities on the Summary Full Campaign Contributions and Expenditure reports (C-4 reports) filed for the February 13, 2019, special election.

On October 27, 2022, PDC staff received an email copy of a signed Statement of Understanding (SOU) completed by you on behalf of the Committee. The SOU acknowledged one violation of RCW 42.17A.235 and .240 was committed by the Committee for failing to timely file the 2018 7-Day Pre-General Election C-4 report for the 2018 general election Bethel School District bond measure.

You stated in the email and your response to the complaint, you are no longer the Treasurer for the Committee, and that the current Treasurer who is in possession of the Committee checkbook is presently ill. You stated you are not able to get a check to make the \$150 penalty payment until next week, but as soon as you got the check you would send staff a copy of the envelope confirming you are mailing the SOU and payment.

The receipt of the emailed SOU by PDC staff and the assurance of prompt payment of the \$150 civil penalty assessed in this matter, in accordance with WAC 390-37143 (Brief Enforcement Penalty Schedule), will resolve the issue of failing to timely file the 2018 7-Day Pre-General C-4 report.

Concerning the late filed C-4 reports for the February 13, 2019, special election, pursuant to WAC 390-37-060(1)(d), the PDC is issuing a formal written warning to you concerning the requirement for the Committee to timely and accurately file the required C-4 reports for the February 13, 2019, special election bond measure. The formal written warning includes staff's expectation that you will timely and accurately file all Committee campaign finance reports in the future. The Commission will consider this formal written warning in deciding on further Commission action, should there be future violations of PDC laws or rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). Thank you for your cooperation and assistance in resolving this matter.

If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s _____
Electronically Signed Kurt Young
PDC Compliance Officer

/s _____
Electronically Signed Peter Lavallee
PDC Executive Director





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October 28, 2022

Sent electronically to Connor Edwards

Subject: Complaint filed against Bethel Citizens for Schools Committee, PDC Case 111247

Connor Edwards:

Public Disclosure Commission (PDC) staff has completed its review of the complaint you filed on August 2, 2022, against the Bethel Citizens for Schools Committee, a local school bond and levy committee registered with the PDC. The complaint alleged that the Bethel Citizens for Schools Committee violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contribution and expenditure activities on Summary Full Campaign Contributions and Expenditure reports (C-4 reports) filed for the February 13, 2019, special election.

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and the 2018 and 2019 ballot committee reporting requirements; the C-4 reports filed by the Bethel Citizens for Schools Committee (Committee), and the email responses from the former Committee Treasurer, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- During calendar year 2018, the Committee registered with the PDC as local ballot measure committee under the Full Reporting option in support of Bethel School District ballot propositions for two elections, that included: (1) the February 13, 2018, Special Election in support of three Bethel School District ballot propositions for Proposition 1, a Maintenance and Operations levy; Proposition 2, a Technology and Capital Projects Levy; and Proposition 3, a \$443 million General Obligations Bond Measure; and (2) the November 6, 2018, General Election for Proposition 1, a \$443 million General Obligations Bond Measure.
- RCW 42.17A.235 requires 2018 ballot measure committees in support of a November 6, 2018, ballot measure and under the Full Reporting option, to timely and accurately file C-3 and C-4 reports, including the 21-Day and 7-Day Pre-General Election C-4 reports.
- On November 6, 2018, the Bethel Citizens for Schools Committee (Committee) filed the 7-Day Pre-General Election C-4 report covering the period October 16 through 29, 2018, disclosing no monetary contributions had been received, and \$7,740.18 in expenditures made.
- The C-4 report disclosed 10 Committee expenditures that were all made on October 29, 2018, and in support of the Bethel School District bond measure.

- Nine of the expenditures were made as follows: (1) four expenditures totaling \$5,528.66 were made to Always Great Graphix for Bethel School Bond Campaign shirts and other promotional advertising; (2) three expenditures were made to EZ Texting totaling \$1,502.06 to send “Robo texts to voters”; (3) a \$348.61 expenditure was made to L2 Political for “Contact Information of Community”; and (4) a \$315.65 expenditure was made to Sandy Williamson for “Vote Bond Card Reimbursement.”
- The 7-Day Pre-General Election C-4 report was required to have been filed no later than October 30, 2018, was filed seven days late by the Committee and on the date of the November 6, 2018, general election.
- For the 2019 February special election, the Committee was registered with the PDC as local ballot measure committee under the Full Reporting option in support of Bethel School District Proposition 1, a \$443 million General Obligations Bond Measure on the February 13, 2019, special election ballot.
- On July 22, 2021, the Committee filed three C-4 reports for the February 13, 2019, special election that included the 21-Day Pre-Special Election C-4 report, the 7-Day Pre-Special Election C-4 report, and the Post Special Election C-4 report. All three C-4 reports disclosed no contributions had been received by the Committee for the bond measure, and no expenditures had been made.
- Mary Ann Mulloy-White, Treasurer for the 2018 and 2019 ballot measure committees, stated that she was no longer the Treasurer for the Committee, but confirmed the Committee made no expenditures for the February 13, 2019, Bethel School District bond measure. She stated that the Committee had inadvertently registered and filed for the wrong election, and contacted PDC staff in 2021 about having filed reports during calendar year 2019.
- Ms. Mulloy stated that the Committee did make some Facebook posts and sent some text messages in support of the February 2019 bond measure, but they did not make any expenditures.
- On October 27, 2022, PDC staff received an email copy of a signed Statement of Understanding (SOU) completed by Ms. Mulloy-White on behalf of the Bethel Citizens for Schools Committee. The SOU acknowledged one violation of RCW 42.17A.235 and .240 by the Committee for failing to timely file the 2018 7-Day Pre-General Election C-4 report for the 2018 general election in support of the Bethel School District bond measure.
- Staff noted that Ms. Mulloy-White was no longer the Treasurer for the Committee. She stated that the current Treasurer who is in possession of the Committee checkbook is presently ill, and she will not be able to get a check to make the \$150 penalty payment until sometime next week. She stated that once she receives the check, she will mail it back to the PDC along with the signed SOU, hopefully by the end of next week. The receipt of the emailed signed copy of the SOU and the assurance of prompt payment of the \$150 civil penalty assessed in this matter, resolves the issue of failing to timely file the 2018 7-Day Pre-General C-4 report.

Based on these findings, including the fact the Committee completed the SOU, and has no prior violations, PDC staff found no evidence of further violations that would require conducting a more formal investigation into the complaint or pursuing enforcement action in this instance.

The three late filed C-4 reports listed above for the February 2019 bond measure were all filed by the Committee well after the February 13, 2019, special election had been held.

However, the late filed reports were mitigated by the facts that no contribution or expenditures were disclosed, and the Committee experienced some electronic filing issues.

Concerning the late filed C-4 reports for the February 13, 2019 special election, pursuant to WAC 390-37-060(1)(d), the PDC is issuing a formal written warning to the Bethel Citizens for Schools Committee for failing to timely file C-4 reports. The formal written warning resolves that allegation and includes staff's expectation that the Bethel Citizens for Schools Committee will timely file all the required campaign finance reports for all future years and elections. The Bethel Citizens for Schools Committee will be advised that the Commission will consider this formal written warning in deciding on further Commission action, should there be future violations of PDC laws or rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC Compliance Officer Kurt Young by e-mail.

Sincerely,

Endorsed by,

/s_____
Electronically Signed Kurt Young
Compliance Officer

/s_____
Electronically Signed Peter Lavalley
PDC Executive Director



cc: Bethel Citizens for School Committee