



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

November 3, 2023

Delivered electronically to "holly.elliott@seiu775.org"

Subject: PDC Case 141192

Dear SEIU 775 Quality Care Committee Sponsored by SEIU PEA

Enclosed is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the enclosed letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter. We appreciate your willingness to voluntarily provide a more detailed description of your expenditures.

If you have questions, you may contact Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,  
*Electronically Signed Philip E. Stutzman*  
Phil Stutzman  
Compliance Officer

Endorsed by,  
*Electronically Signed Kim Bradford*  
Kim Bradford  
Deputy Director  
For Peter Frey Lavalley  
Executive Director



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November 3, 2023

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding SEIU 775 Quality Care Committee Sponsored by SEIU PEAFF, PDC Case 141192

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 4, 2023. Your complaint alleged that SEIU 775 Quality Care Committee Sponsored by SEIU PEAFF (SEIU 775 Quality Care Committee or the Committee) may have violated RCW 42.17A.260 by failing to provide a detailed description of the expenditure on C-6 reports required for political advertising with a value of \$2,000 or more, published, mailed or otherwise presented to the public within 21 days of an election and RCW 42.17A.305 by failing to provide the required detailed description for electioneering communications, which, by definition, have a value of \$2,000 or more.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by SEIU 775 Quality Care Committee; the applicable PDC reports filed by Respondent, including amended reports filed in response to the complaint; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The complaint identified ten C-6 reports filed by SEIU 775 Quality Care Committee in July 2023 in support of candidates. Three of the C-6 reports concerned Independent Expenditure mailings for which the Committee paid Moxie Media to prepare and mail. The three C-6 reports that reported Independent Expenditure mailings were filed on July 12, July 19, and July 26, 2023. The description of the expenditure for each report was "IE Mailing."
- The remaining seven C-6 reports identified in the complaint concerned Independent Expenditures for which the committee reported the vendor as SEIU 775 and provided a description of the Independent Expenditure as "In-Kind Staff Phone/Text," which was provided by SEIU 775, the entity that controls the Committee.
- On August 31, 2023, SEIU 775 Quality Care Committee amended the three C-6 reports that concerned Independent Expenditure mailings for which the Committee paid Moxie Media to prepare and mail. The amended reports included additional expenditure detail describing the work performed by Moxie Media for the Committee and included the names of sub-vendors and

the number of pieces mailed. For example, C-6 report 11969, filed on July 12, 2023 was amended by C-6 report 12012 on August 31, 2023. The total cost for the original and amended C-6 reports was \$7,311.16, in support of Brittany Williams. The amended C-6 included the following descriptions and amounts for its payment to Moxie Media, which total \$7,311.16:

- IE Mailing Consulting Fee \$2,701.39
  - Claro Creative Graphics \$700.00
  - Cap City Press (6,000 pieces)
  - Cap City Press Mail Services \$349.28
  - Expenditures \$200 or less \$93.75
  - USPS – Postage \$1,886.86
- SEIU 775 Quality Care Committee did not amend the remaining seven C-6 reports identified in the complaint, stating they did not do so because the expenditures listed in these reports involved in-kind contributions of staff time for phone calls and texts in support of City of Burien candidates for which the Committee did not use a sub-vendor for robocalls or mass texting. The Committee further stated that WAC 390-16-037, Example A, indicates that the number of calls or texts placed is not required to be reported.

The PDC has not issued guidance concerning what is required to satisfy the reporting requirements in RCW 42.17A.260 and RCW 42.17A.305 to provide “a detailed description of expenditures.” Although specific standards are not explicitly required by statute or rule, staff appreciates the value of a detailed description of expenditures and is thankful for the Committee’s willingness to voluntarily provide a more detailed description of their expenditures to vendors. The Committee provided a general description of internal services when outside vendors were not used and the PDC has not issued guidance suggesting that additional detail be provided.

PDC staff will consider providing additional guidance concerning the meaning of “a detailed description of expenditures” and for describing the use of internal staff to conduct campaign activities when reporting independent expenditures and electioneering communications.

Based on these findings, staff has determined that in this instance, the alleged failure to provide sufficient details describing expenditures to outside vendors and the campaign activities of internal staff when reporting independent expenditures and electioneering communications does not amount to a finding of a violation warranting further investigation.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,  
*Electronically Signed Philip E. Stutzman*  
Phil Stutzman  
Compliance Officer

Endorsed by,  
*Electronically Signed Kim Bradford*

Kim Bradford  
Deputy Director  
For Peter Frey Lavalley  
Executive Director

cc: SEIU 775 Quality Care Committee Sponsored by SEIU PEA