



State of Washington
PUBLIC DISCLOSURE COMMISSION

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Memorandum

To: Public Disclosure Commission
From: Tabatha Blacksmith, Compliance Officer
Date: September 12, 2024
Subject: Bethel Citizen's Committee for School Support Brief Adjudicative Proceeding
(Brief Enforcement Hearing) Memorandum: PDC Case 141631

Allegations

Public Disclosure Commission (PDC) staff alleges that Bethel Citizen's Committee for School Support, a political committee, violated RCW 42.17A.235 and RCW 42.17A.240 by failing timely and accurately file C-3 reports and C-4 reports disclosing contributions and expenditures undertaken by the committee and provide required expenditure details on C-4 reports for election year 2022 that were due to be filed from 2019¹ to 2022.

Background

- Bethel Citizen's Committee for School Support (the "Respondent") registered as a continuing political committee on October 13, 2021 for election year 2022, selected the Full Reporting option, and indicated their support for a Bethel School District 403 levy, bond or advisory vote (to be determined) in a 2022 Special Election. The *Committee Registration* (C-1pc report) was amended on August 18, 2022 to update the committee's contact information and change their Treasurer of record. (**Exhibit 1**)
- It should be noted that the Respondent committee was previously registered for election year 2019 to support a different ballot proposition for Bethel SD 403 in a 2019 Special Election. As a result, both the 2019 and 2022 committees filed reports for 2019. Late reporting by the 2019 committee was addressed in a previous enforcement action (PDC Case 111247) and is therefore not included in the scope this case (141631). However, late reporting for the 2022 committee that occurred from 2019-2022 is addressed herein.

¹ According to its filing history, the 2022 committee's first reportable activity for election year 2022 occurred on January 26, 2019.

- Pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#), a committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports). The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity.
- The following Bethel School District ballot propositions were placed before voters in 2022:
 - Proposition 1 (No. 1) - February 8, 2022 Special Election (rejected)
 - Proposition 1 (No. 2) - February 8, 2022 Special Election (rejected)
 - Proposition 1 (No. 1) - April 26, 2022 Special Election (approved)
 - Proposition 1 (No. 2) - April 26, 2022 Special election (approved)

PDC staff attempted to confirm the extent of the Respondent's participation in the above elections by email on May 28, 2024, June 7, 2024 and July 9, 2024. However, to date, the committee has not provided this information.

- Key reporting dates for committees participating in the February 8, 2022 and April 26, 2022 Special Elections are attached. **(Exhibit 2)**
- On August 30, 2023, PDC staff opened this case for the Respondent based upon a complaint filed by Glen Morgan alleging the committee failed to timely and accurately file C-3 reports and C-4 reports disclosing contributions and expenditures undertaken by the committee and provide required expenditure details on C-4 reports that were due to be filed in years 2018²-2022. **(Exhibit 3)**
- The committee's Treasurer provided a written response to the complaint on October 5, 2023, apologizing for the delay. She said she took over the task of filing the Respondent's reports but had trouble logging in and submitting reports. The Treasurer said she works a full-time job, has a family and cares for a brother with special needs, but would work to bring the committee's reports up to date within the next couple of weeks. **(Exhibit 4)**
- On October 9, 2023, PDC staff asked the Treasurer, by email, if she needed help from the PDC's Filer Assistance team with logging in and accessing reports. She responded by email on October 12, 2023, indicated her intention to work on reports next week and said she may need to reach out to the PDC if she could not log in to ORCA (the online filing system).
- On November 15, 2023, PDC staff emailed the Respondent a list of six C-4 reports for 2021 and 2022 that need to be amended to include additional expenditure details. The Treasurer responded the next day, apologized for the late reporting, and indicated she had been gathering data to file reports and would work on them that weekend.
- A Case Status Review (Initial Hearing) was held for this case on November 20, 2023. The Respondent did not attend the hearing. After the hearing had concluded, PDC staff received

² Per [RCW 42.17A.770](#), any action brought under Chapter 42.17A must be commenced within five years after the date the violation occurred.

an email from the committee's Treasurer indicating she was unable to attend because she works from 7AM to 4PM.

- On May 28, 2024, June 7, 2024 and July 9, 2024, PDC staff reminded the Respondent, by email, that amendments were still needed for the C-4 reports identified in our November 15, 2023 email. In these emails, we expressed concern that no new reports had been filed or amended since the case was opened and reminded the committee that PDC staff were available to help them file reports, if needed.
- On July 17, 2024, the committee's Treasurer responded to our July 9, 2024 email, apologized for the delay in responding, said she has been on FMLA due to a severe illness and has a stressful new job. In that email, she indicated she planned to contact a firm to file the committee's reports and would let the PDC know when the firm had accepted. **(Exhibit 5)**
- PDC staff emailed the Respondent on July 29, 2024 to inquire whether a firm had been secured and, if not, when they expected this to be accomplished.
- On August 6 & 7 of 2024, PDC staff served the Respondent, by mail and email, with a hearing notice for a September 12, 2024 Brief Adjudicative Proceeding (Brief Enforcement Hearing) before a Presiding Officer of the Public Disclosure Commission concerning their failure to timely file C-3 and C-4 reports and amend expenditure descriptions that were due to be filed in years 2019-2022. The notice was sent to the 2022 committee's email address of record, the 2022 Treasurer's personal email address and mailed to the committee's address of record. **(Exhibit 6)**
- On August 28, 2024, PDC staff emailed the Respondent a detailed list of missing C-4 reports (for which C-3 reports had been filed) and amended reports that required correction. In the email, we encouraged the committee to take the following actions prior to the September 12, 2024 Brief Enforcement Hearing:
 - File missing C-4 reports disclosing contributions totaling \$22,803.82 that were deposited in 2019, 2020, and 2022 and a \$90.40 reimbursement received in 2020 for a cancelled service. We informed the committee that it could file a single C-4 report for each year in lieu of monthly reports.
 - Amend four monthly C-4 reports, two pre-election C-4 reports, and one C-3 report for 2021 and 2022 to disclose contributions totaling \$5,702.51, make two corrections to reports, and amend six C-4 reports for 2021 and 2022 that lack expenditure descriptions.
- As of August 30, 2024 and despite multiple requests, the Respondent has not filed or amended any C-3 or C-4 reports or accessed its ORCA (online filing) account for election year 2022 since August 15, 2022 and we are unable to locate any written record showing the Respondent has reached out to our Customer Service or Filer Assistance team for help.
- Of the reports that were filed for election year 2022 (as of August 15, 2022), the following were late:

- A 21-day pre-Special Election C-4 report for 2022 that was filed 52 days late and after the February Special Election disclosing \$337.70 in election-related expenditures.
- A 7-day pre-Special Election C-4 report for 2022 that was filed 63 days late and after the February Special Election disclosing \$2,830.58 in election-related expenditures.
- A post-Special Election C-4 report for 2022 that was filed 26 days late disclosing \$2,054.50 in election-related expenditures including political advertising.
- One monthly report for 2022 (March) was filed 126 days late and after the April Special Election disclosing \$3,980.91 in election-related expenditures, including political advertising.
- Four monthly C-4 reports for 2022 were filed 5-97 days late, one of which contained at least \$773.26 in election-related expenditures. One of the late monthly C-4 reports (for July) is mitigated by a lack of contribution and expenditure activity.
- Nine late C-3 reports for 2019, 2020 and 2021 were filed 217-899 days late.

Mitigating and Aggravating Factors

[WAC 390-37-061\(4\)](#) sets forth factors that may be considered when resolving minor violations, five of which appear to apply in this case:

- Mitigating factor: The Respondent's Treasurer reported she has been on FMLA due to severe illness.
- Mitigating factor: The campaign appears to be relatively small or unsophisticated.
- Potential mitigating factor (unconfirmed): It is unclear if the campaign is experiencing any technical issues that frustrate compliance.
- Aggravating factor: Noncompliance concerns pre-election reports, which deprived the public of timely information during time-sensitive periods prior to the 2022 Special Elections.
- Potential aggravating factor (to be determined): If the required missing reports are not filed by the date of the Brief Enforcement Hearing, this would be an aggravating factor.
- Aggravating factor: The Respondent committee has one prior occasion of a violation of RCW 42.17A.235 and .240 that occurred outside the PDC's 5-year statute of limitations. The case (111247) was resolved on October 28, 2022 via the Respondent's submission of a signed *Statement of Understanding* and a \$150 penalty, and a formal Written Warning letter. **(Exhibit 7)**

The late reports for election year 2022 identified above were filed prior to October 28, 2022 and therefore did not violate the Warning letter issued in prior case 111247.

Occasion and Penalty Schedule

If the Presiding Officer finds the Respondent violated RCW 42.17A.235 and RCW 42.17A.240 at this Brief Adjudicative Proceeding (Brief Enforcement Hearing), it will constitute their second occasion of a violation of .235 and .240.

However, for the purpose of assessing base penalty amounts, [WAC 390-37-143\(1\)](#) states “only violations in the last five years will be considered for the purpose of determining second and third occasions” of a violation.

The penalty schedule for Brief Enforcement Hearings is found in [WAC 390-37-182](#).

Exhibit List:

Exhibit 1 – PDC Case 141631 – *Committee Registration* (C-pc report) amended August 18, 2022
Exhibit 2 – Key Reporting Dates for 2022 Special Elections
Exhibit 3 – PDC Case 141631 – Complaint from Glen Morgan, dated August 21, 2023
Exhibit 4 – PDC Case 141631 – Written response to complaint, dated October 5, 2023
Exhibit 5 – PDC Case 141631 – Email from Treasurer, dated July 17, 2024
Exhibit 6 – PDC Case 141631 – Brief Enforcement Hearing Notice, served August 6-7, 2024
Exhibit 7 – PDC Case 111247 – *Statement of Understanding* (SOU), signed July 7, 2023, and Warning Letter, dated October 28, 2022

PDC Exhibit 1

[Home](#) / [Committees](#) / [Bethel Citizen's Committee for School Support](#)



Bethel Citizen's Committee for School Support (BCCSS)

10906 152nd St Ct E
Puyallup , WA 98374
yesforthebond@gmail.com
253-677-1172

Registration filed

Committee Category: Education

Pac
Full Reporting
Submitted date: 08/18/2022
Certified by iamforthebond@gmail.com
Continuing
Originally targeting 2022S2
BETHCC 445

Bank information

Timberland Bank
2419 224th St E
Spanaway , WA 98387
To schedule books review contact yesforthebond@gmail.com

Officers

Carole Wagner & Tara Chinneth




Treasurer
10906 152nd St Ct E
Puyallup, WA 98374
yesforthebond@gmail.com
253-677-1172

Ballot Propositions

Supporting #TBD




Bethel Sd 403
Levy, Bond or Advisory Vote
2022S2

Registration attachments

Name	Description	Document Type	Actions
No data available			
Rows per page: 10  -  			

Committee attachments

Name	Description	Submitted At	Document Type	Actions
No data available				

Rows per page: 10  -  

PDC Exhibit 2

Key Reporting Dates – 2022 Special Elections

ELECTION DATE	Start Filing C-3s on Mondays		File C-4 21 days before election	File C-4 7 days before election	File C-4 10 th of the first month after election
February 8	Oct 1, 2021	<i>File monthly C-4 reports from the beginning of the campaign through November 2021 (C-4 due 12/10/21) then →</i>	January 18	February 1	March 10
			Report covers Dec 1, 2021 – Jan 17, 2022	Report covers Jan 18 – 31, 2022	Report covers Feb 1 – 28, 2022
April 26	Dec 1, 2021	<i>File monthly C-4 reports from the beginning of the campaign through February 2022 (C-4 due 3/10/22) then →</i>	April 5	April 19	May 10
			Report covers March 1 – April 4, 2022	Report covers Apr 5– Apr 18, 2022	Report covers Apr 19– 30, 2022

PDC Exhibit 3

Respondent Name(s)
Bethel Citizen's Committee for School Support
Complainant Name(s)
Glen Morgan
Complaint Description
<p><u>Glen Morgan</u> reported via the portal <i>(Mon, 21 Aug 2023 at 9:53 PM)</i> To whom it may concern,</p> <p>It has come to my attention, that the Bethel Citizens Committee for School Support PAC has violated Washington State's campaign finance laws (RCW 42.17A). The specific violations are detailed below:</p> <p>1) Attempting to conceal the truth about political activity from the public by waiting weeks, months, or even years to report what they did or who funded them (Violation RCW 42.17A.235, RCW 42.17A.240)</p> <p>I had recently reviewed some of the out of control and egregious lawbreaking by the WEA PAC, which encouraged me to look at some of the school tax committees out there. As PDC staff are well aware, I've caught many breaking the law, and some have been fined or sanctioned for their lawbreaking. However, this one set a new record for lateness of supposedly "accurate" reports.</p> <p>I try to provide specific examples of lawbreaking in a very easy-to-read and simpler to understand spreadsheet format. This is both for PDC staff convenience, but it also helps the lawbreakers use the list as a reference sheet so that they can go back and try to explain, justify, or excuse their repetitive lawbreaking activities. I've attached this both as an Excel file and a PDF so that everyone involved can get the optimal value from the effort. Please note that the original report referenced in the spreadsheet can be linked by clicking on the far-right column. I believe this makes it easier for everyone.</p> <p>A quick note again on how this report is organized. I've organized it by latest report first. You'll note that the latest report filed by this group was 987 days late, which in the last 50 complaints or so I've filed over the past month is probably this year's state record. I'll see if I can find any other group who concealed the truth for this long, but it won't be easy.</p> <p>I've color coded the most extreme late reports red, as I usually do, of which there are 24 of these. That may not seem like a lot – but seriously, look at how late and how much financial influence on local elections has been concealed from the public for years. This is some impressive lawbreaking here. A very reckless disregard for the truth or the public to see the truth. This alone was enough to justify filing a complaint against this gang.</p>

2) Failure to accurately describe expense, and the illegal concealment of required information from the public. (Violation of RCW 42.17A.240, RCW 42.17A.235 & WAC 390-16-037)

Once I realized this PAC would so egregiously violate the law with such reckless disregard for the public to know the truth, I kept looking closer. It turns out this PAC has failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures frequently (of course). Here **are a few specific examples of failing to follow the law. These are clear and explicit violation of WAC 390-16-037:**

- On **PDC Report #110106943, attached for staff reference**, this PAC claims to have **spent \$1,769.39 on texts** with vendor EZ Texting, but of course, they failed to report the legally required details for these. How many texts were sent? When were they sent? How many types? Also, this PAC on the same report, \$761.20 on "postcards" but again, they don't provide the legally required details – how many? These are both explicit **violations of WAC 390-16-037, Example B and Example A.**
- On **PDC Report # 110078922, attached for staff reference**, this PAC **claims to have spent \$1,524.24 on texting and another \$530.26 on texting.** Once again, no details provided. These companies all provide the number of texts they sent, etc. This is information this PAC must report to the public, and they chose to conceal it instead. Again, another **clear and obvious violation of WAC 390-16-037, Example A.**
- On **PDC Report # 110106982, attached for staff reference**, this secretive lawbreaking PAC claims to have **spent \$773.26 on more texting**, but once again, of course, they failed to report when, how many ,etc , which is an **explicit violation of WAC 390-16-037, Example A.**
-

It seems likely, in light of this PACs tendency to conceal so much for so many years from the public with their late reports, that these additional examples of lawbreaking are probably very limited and there are likely to be even more violations if PDC staff look closer.

I do strongly suggest that the PDC gets a subpoena for the bank records on this PAC and see how far off the bank account records are from the public reports filed by this entity. It seems like you could save a lot of time and hassle taking this approach.

Regardless, it is a shame these well-funded PACs can't follow the law.

Let me know if you need anything else on this one.

Best Regards,

Glen Morgan

Bethel Cit Comm for School Support - illegally missing more details - C4 - 110106982.pdf
4.4 MB

Bethel Cit Comm for School Support - illegally missing details - C4 - 110078922.pdf
2.77 MB

Bethel Cit Comm for School Support PAC - Illegally late reports - PDF file.pdf
437.95 KB

Bethel Cit Comm for School Support PAC - Illegally late reports.xlsx
13.45 KB

Bethel Cit Comm for School Support - illegally missing details - C4 - 110106943.pdf
3.34 MB

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

Even well-funded secretive PACs like this one should not be allowed to conceal the truth from the public for many years about how they spent their campaign cash or who funded their operation to influence the election. This is just a sad example and a poor example for our kids.

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

All attached clearly as exhibits or in the body of the complaint

List of potential witnesses with contact information to reach them

Every officer involved in this PAC, but also a subpoena of the bank records would be a good place to start

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.



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**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Bethel Citizen's Committee for School Support (BCCSS)
Bethel Citizen's Committee for School Support -
20905 77th Ave Ct E
Spanaway, WA 98387

Coverage: 04/01/2022 to 04/30/2022
Final report: No
Report number: 110106982
Reporting year: 2022
Date submitted: 08/15/2022

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$54,650.74
2. Cash received (Schedule A line 1).	\$2,048.18	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$2,048.18
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$56,698.92
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$22,662.45
11. Cash expenditures (Line 3 schedule A).	\$12,290.66	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$12,290.66
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$34,953.11

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$21,745.81
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$21,745.81

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Mary Ann Mulloy-White - 08/15/2022

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
04/06/2022	\$2,048.18				

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$2,048.18

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$153.42
04/01/2022	ALLSTAR LETTERMAN JACKET 12110 Meridian E Unit 2 , Puyallup, WA 98373	Campaign merchandise/paraphernalia: Shirts	\$504.44
04/04/2022	EZ TEXTING 1410 2ND STREET SUITE 200 , SANTA MONICA, CA 90401	Surveys, polling, research costs: Surveys, polling, research costs	\$1,735.69
04/04/2022	L2 POLITICAL 18912 N CREEK PARKWAY BLDG 1 SUITE 200 , BOTHELL, WA 98011	Surveys, polling, research costs: Surveys, polling, research costs	\$2,823.55
04/06/2022	USPS 16815 PACIFIC AVE S , SPANAWAY, WA 98387	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps	\$424.00
04/06/2022	USPS 16815 PACIFIC AVE S , SPANAWAY, WA 98387	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps	\$880.00
04/06/2022	USPS 16815 PACIFIC AVE S , SPANAWAY, WA 98387	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps	\$1,600.00
04/12/2022	EZ TEXTING 1410 2ND STREET SUITE 200 , SANTA MONICA, CA 90401	Surveys, polling, research costs: Surveys, polling, research costs	\$1,714.85
04/13/2022	AMAZON 410 TERRY AVE N , Seattle, WA 98109	Campaign merchandise/paraphernalia: I voted stickers	\$189.95
04/19/2022	EZ TEXTING 1410 2ND STREET SUITE 200 , SANTA MONICA, CA 90401	Surveys, polling, research costs: Surveys, polling, research costs	\$399.65
04/22/2022	ALWAYS GREAT GRAPHIX 3210 234TH ST E UNIT F , SPANAWAY, WA 98387	Campaign merchandise/paraphernalia: T-shirts	\$638.00
04/25/2022	USPS	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps	\$116.00

\$12,290.66

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
	16815 PACIFIC AVE S , SPANAWAY, WA 98387		
04/25/2022	USPS 16815 PACIFIC AVE S , SPANAWAY, WA 98387	Postage costs, mail permits, purchase of stamps: Postage costs, mail permits, purchase of stamps	\$116.00
04/26/2022	EZ TEXTING 1410 2ND STREET SUITE 200 , SANTA MONICA, CA 90401	Digital advertising: Texting	\$773.26
04/27/2022	SAFEWAY STORES, INC 5616 176th St E , Puyallup, WA 98375	Office supplies, furniture, staff food & beverages, etc.: Food for meeting	\$221.85
			\$12,290.66
4. TOTAL EXPENDITURES:			\$12,290.66



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**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Bethel Citizen's Committee for School Support (BCCSS)
Bethel Citizen's Committee for School Support -
20905 77th Ave Ct E
Spanaway, WA 98387

Coverage: 02/01/2022 to 02/28/2022
Final report: No
Report number: 110078922
Reporting year: 2022
Date submitted: 04/05/2022

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$49,080.20
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$49,080.20
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$16,146.02
11. Cash expenditures (Line 3 schedule A).	\$2,484.39	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$2,484.39
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$18,630.41

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$30,449.79
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$30,449.79

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Mary Ann Mulloy-White - 04/05/2022

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$0.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$129.43
02/04/2022	EZ TEXTING 1410 2ND STREET SUITE 200 , SANTA MONICA, CA 90401	Digital advertising: Texting	\$530.26
02/07/2022	EZ TEXTING 1410 2ND STREET SUITE 200 , SANTA MONICA, CA 90401	Digital advertising: Texting	\$1,524.24
02/07/2022	ALWAYS GREAT GRAPHIX 3210 234TH ST E UNIT F , SPANAWAY, WA 98387	Campaign merchandise/paraphernalia: Campaign t-shirts	\$148.50
02/09/2022	SAFEWAY STORES, INC 5616 176th St E , Puyallup, WA 98375	Office supplies, furniture, staff food & beverages, etc.: Food for results gathering	\$151.96
			\$2,484.39

4. TOTAL EXPENDITURES: \$2,484.39

Bethel Cit Committee Totally illegal concealment for years of financial activity from the public

Report #	Type	Amends	Deposit Date	From	Through	Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity	Filer	Hyperlink
110057472	C3	0	1/26/2019			2/11/2019	10/25/2021	987	\$2,242.93	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4977695
110034936	C4	0		12/1/2018	1/21/2019	1/10/2019	7/22/2021	924	\$0.00	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4954483
110057558	C3	0	4/1/2019			5/10/2019	10/25/2021	899	\$3,180.52	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4977793
110034937	C4	0		1/22/2019	2/4/2019	2/11/2019	7/22/2021	892	\$0.00	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4954482
110034938	C4	0		2/5/2019	2/28/2019	3/11/2019	7/22/2021	864	\$0.00	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4954486
110057620	C3	0	8/26/2019			9/10/2019	10/25/2021	776	\$6,339.10	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4977864
110060981	C3	0	1/27/2020			2/10/2020	11/9/2021	638	\$902.40	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4981539
110058149	C3	0	2/23/2020			3/10/2020	10/26/2021	595	\$4,913.40	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4978424
110061038	C3	0	9/24/2020			10/12/2020	11/9/2021	393	\$4,124.65	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4981597
110106952	C3	0	12/9/2021			1/10/2022	8/15/2022	217	\$43.99	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106952
110106942	C3	0	12/9/2021			1/10/2022	8/15/2022	217	\$43.99	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106942
110106915	C3	0	12/9/2021			1/10/2022	8/15/2022	217	\$43.99	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106915
110106913	C3	110063375	12/3/2021			1/10/2022	8/15/2022	217	\$463.01	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106913
110106943	C4	0		3/1/2022	3/31/2022	4/11/2022	8/15/2022	126	\$4,056.03	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106943
110106982	C4	0		4/1/2022	4/30/2022	5/10/2022	8/15/2022	97	\$12,290.66	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106982
100875204	C3	100856416	9/5/2018			9/10/2018	12/4/2018	85	\$6,287.35	BETHEL CITIZEN'S FOR SCHOOL SUPPORT	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4770040
110074553	C4	110063385		11/1/2021	11/30/2021	12/10/2021	2/28/2022	80	\$15.12	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4995530
110106984	C4	0		5/1/2022	5/31/2022	6/10/2022	8/15/2022	66	\$41.52	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106984
110077049	C4	0		12/1/2021	1/17/2022	1/10/2022	3/11/2022	60	\$415.22	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4998100
110078921	C4	0		1/18/2022	1/31/2022	2/10/2022	4/5/2022	54	\$3,100.70	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110078921
110106993	C4	0		7/1/2022	7/31/2022	7/12/2022	8/15/2022	34	\$0.00	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106993
110106988	C4	0		6/1/2022	6/30/2022	7/12/2022	8/15/2022	34	\$26.40	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110106988

110078922 C4	0	2/1/2022	2/28/2022	3/10/2022	4/5/2022	26	\$2,484.39	Bethel Citizen's Committee for School Support (BCCSS)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110078922
100882281 C4	0	12/1/2018	12/31/2018	1/10/2019	1/26/2019	16	\$1,808.94	BETHEL CITIZEN'S FOR SCHOOL SUPPORT	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4777707
100873173 C4	0	10/16/2018	10/29/2018	10/30/2018	11/6/2018	7	\$7,740.18	BETHEL CITIZEN'S FOR SCHOOL SUPPORT	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4767770
100867634 C4	0	9/1/2018	10/15/2018	10/16/2018	10/21/2018	5	\$0.00	BETHEL CITIZEN'S FOR SCHOOL SUPPORT	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4761916
110061731 C4	110061380	10/13/2021	10/31/2021	11/10/2021	11/12/2021	2	\$0.00	Bethel Citizen's Committee for School Support (BCCSS)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4982290



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Bethel Citizen's Committee for School Support (BCCSS)
Bethel Citizen's Committee for School Support -
20905 77th Ave Ct E
Spanaway, WA 98387

Coverage: 03/01/2022 to 03/31/2022
Final report: No
Report number: 110106943
Reporting year: 2022
Date submitted: 08/15/2022

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$49,080.20
2. Cash received (Schedule A line 1).	\$5,570.54	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$5,570.54
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$54,650.74
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$18,606.42
11. Cash expenditures (Line 3 schedule A).	\$4,056.03	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$4,056.03
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$22,662.45

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$31,988.29
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$31,988.29

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Mary Ann Mulloy-White - 08/15/2022

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
03/29/2022	\$688.00	03/29/2022	\$2,435.54	03/29/2022	\$2,447.00

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$5,570.54

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$15.12
03/10/2022	STICKER MULE 36 Forest Ave , Amsterdam, NY 12010	Campaign merchandise/paraphernalia: Campaign buttons	\$327.80
03/10/2022	SAFEWAY STORES, INC 5616 176th St E , Puyallup, WA 98375	Campaign merchandise/paraphernalia: Snack candy for the YES campaign tables	\$82.49
03/17/2022	NSA TAX SERVICE 22208 MOUNTAIN HWY E SUITE B , SPANAWAY, WA 98387	Accounting, legal, regulatory compliance, etc.: Accounting, legal, regulatory compliance, etc.	\$60.00
03/24/2022	SAFEWAY STORES, INC 5616 176th St E , Puyallup, WA 98375	Campaign merchandise/paraphernalia: Snack candy for the YES tables at school functions	\$80.00
03/25/2022	ALWAYS GREAT GRAPHIX 3210 234TH ST E UNIT F , SPANAWAY, WA 98387	Campaign merchandise/paraphernalia: Campaign t- shirts	\$960.03
03/28/2022	EZ TEXTING 1410 2ND STREET SUITE 200 , SANTA MONICA, CA 90401	Digital advertising: Texting	\$1,769.39
03/30/2022	PARKLAND QUICKPRINT 11319 Pacific Ave S , Tacoma, WA 98444	Printing literature, fliers, postcards, etc. : Postcards	\$761.20
			\$4,056.03

4. TOTAL EXPENDITURES: \$4,056.03

PDC Exhibit 4

[Carole Wagner](#) reported via email
(Thu, 5 Oct 2023 at 3:24 PM)
To: "pdc@pdc.wa.gov" pdc@pdc.wa.gov

External Email

Good afternoon,

I first want to apologize for the tardy response. I am attaching the receipts for the eztexts that the campaign did.

I took over doing the reporting but I have been having trouble logging in and doing the reports. I will be working on these the next couple of weeks to bring them current.

I work a full-time job. I have a family and take care of my special needs brother.

Make it a great day!
Carole Wagner
2536771172

eztexting.pdf
531.38 KB



Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

4 messages

EZ Texting <no-reply@eztexting.com>

To: Mary Ann <iamforthebond@gmail.com>

Thu, Feb 3, 2022 at 6:34 PM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

2/3/22 - \$5.50
2/3/22 - \$580.20
2/3/22 - \$5.50
~~2/3/22 - \$5.50~~

Credits - 100

\$5

Subtotal	\$5
Taxes	\$0.5

Total	\$5.5
-------	-------

Date 2/3/22 21:34

Billed to

Transaction ID 2198588

Mary Ann Mulloy-White

Invoice #2198588

yesbethelkids.com
(253) 202 6090

Payment Method Card ending 1040 ☐

[VIEW INVOICE](#)

Thank you for being a valued EZ Texting customer.

Thank you for being a valued EZ Texting customer.



Questions? Visit our general [FAQ](#), [Sales Tax](#)
[FAQ](#) or [Contact Us](#)

Phone: **(800) 753-5732**

© 2022 EZ Texting, Inc

EZ Texting <no-reply@eztexting.com>
To: Mary Ann <iamforthebond@gmail.com>

Thu, Feb 3, 2022 at 7:05 PM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Exh 4 - 000006

Credits - 100

\$5

Subtotal

\$5

Taxes

\$0.5

Total

\$5.5

Date 2/3/22 22:05

Billed to

Transaction ID 2198585

Mary Ann Mulloy-White

Invoice #2198585

yesbethelkids.com

(253) 202 6090

Payment Method Card ending 1040 

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[FAQ](#) or [Contact Us](#)

Phone: **(800) 753-5732**

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EZ Texting <no-reply@eztexting.com>

To: Mary Ann <iamforthebond@gmail.com>

Thu, Feb 3, 2022 at 7:05 PM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Credits - 100

\$5

Subtotal

\$5

Taxes

\$0.5

Total

\$5.5

Date 2/3/22 22:05

Transaction ID 2198577

Invoice #2198577

Payment Method Card ending 1040 ☐

Billed to

Mary Ann Mulloy-White
yesbethelkids.com
(253) 202 6090

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Questions? Visit our general [FAQ](#), [Sales Tax](#)

[FAQ](#) or [Contact Us](#)

Phone: [\(800\) 753-5732](#)

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EZ Texting <no-reply@eztexting.com>

To: Mary Ann <iamforthebond@gmail.com>

Thu, Feb 3, 2022 at 7:02 PM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Credits - 9641

\$482.05

Subtotal

\$482.05

Taxes

\$48.21

Total

\$530.26

Date 2/3/22 22:02

Billed to

Transaction ID 2198599

Mary Ann Mulloy-White

Invoice #2198599

yesbethelkids.com
(253) 202 6090

Payment Method Card ending 1040 ☐

[VIEW INVOICE](#)

Your EZ Texting Receipt Inbox x



EZ Texting <no-reply@eztexting.com>
to me ▾

Sat, Feb 5, 1:15 PM (3 days ago)



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Credits - 29172	\$1385.67
------------------------	------------------

Subtotal	\$1385.67
Taxes	\$138.57
Total	\$1524.24

Date 2/5/22 16:15

Transaction ID 2200061

Invoice #2200061

Payment Method Card ending 1040

Billed to

Mary Ann Mulloy-White

yesbethelkids.com

(253) 202 6090

[VIEW INVOICE](#)

Thank you for being a valued EZ Texting customer.



Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

* message

The EZ Texting Team <no-reply@eztexting.com>
To: Mary Ann Mulloy-White <iamforthebond@gmail.com>

Sun, Jun 19, 2022 at 2:44 AM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Package - Value (30 days, 6/19/22 - 7/19/22)	\$24.00
Subtotal	\$24.00
Taxes	\$2.40
Total	\$26.40

Date 2022-06-19 02:44:30**Transaction Id** 2353026003**Invoice #** 22445633003**Payment Method** Card ending 1040**Billed to**

Mary Ann Mulloy-White

EZ Texting

(253) 202 6090

[VIEW INVOICE](#)



Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

1 message

The EZ Texting Team <no-reply@eztexting.com>
To: Mary Ann Mulloy-White <iamforthebond@gmail.com>

Thu, May 19, 2022 at 2:42 AM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Package - Value (31 days, 5/19/22 - 6/19/22)	\$24.00
---	----------------

Subtotal	\$24.00
Taxes	\$2.40
Total	\$26.40

Date 2022-05-19 02:42:47**Transaction Id** 2293857003**Invoice #** 21805617003**Payment Method** Card ending 1040**Billed to**

Mary Ann Mulloy-White

EZ Texting

(253) 202 6090

[VIEW INVOICE](#)



Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

MESSAGE

EZ Texting <no-reply@eztexting.com>
To: Mary Ann <iamforthebond@gmail.com>

Sun, Apr 3, 2022 at 2:19 PM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

\$ 1735.69

Credits - 33219

\$1577.9

Subtotal

\$1577.9

Taxes

\$157.79

\$1735.69

<https://mail.google.com/mail/u/0/?ik=e22c33fc21&view=pt&search=all&permthid=thread-f%3A1729123587710421237&simpl=msg-f%3A1729123587710421237>

TOTAL

\$1735.69

Date 4/3/22 17:19

Billed to

Transaction ID 2243581

Mary Ann Mulloy-White

Invoice #2243581

yesbethelkids.com

(253) 202 6090

Payment Method Card ending 1040 ☐

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[FAQ](#) or [Contact Us](#)

Phone: **(800) 753-5732**

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Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

message

EZ Texting <no-reply@eztexting.com>

To: Mary Ann <iamforthebond@gmail.com>

Mon, Apr 11, 2022 at 4:53 PM



\$1,714.85

Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Credits - 32820

\$1558.95



Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

2 messages

EZ Texting <no-reply@eztexting.com>

To: Mary Ann <iamforthebond@gmail.com>

Mon, Apr 18, 2022 at 7:33 PM



\$26.13

Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Package - Value

\$23.75



Questions? Visit our general [FAQ](#), [Sales Tax](#)
[FAQ](#) or [Contact Us](#)
Phone: **(800) 753-5732**
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EZ Texting <no-reply@eztexting.com>
To: Mary Ann <iamforthebond@gmail.com>

Mon, Apr 18, 2022 at 7:41 PM



\$399.65

Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.



Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

1 message

EZ Texting <no-reply@eztexting.com>

To: Mary Ann <iamforthebond@gmail.com>

Tue, Apr 19, 2022 at 9:04 AM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

Credits - 125

\$5.50

Subtotal

\$5.50



Bond Supporter <iamforthebond@gmail.com>

Your EZ Texting Receipt

1 message

The EZ Texting Team <no-reply@eztexting.com>
To: Mary Ann Mulloy-White <iamforthebond@gmail.com>

Sun, Apr 24, 2022 at 11:33 AM



Hi Mary Ann,

Thank you for your order!

This is your receipt for your recent purchase on EZ Texting.

17574 Credits	\$702.96
----------------------	-----------------

Subtotal	\$702.96
Taxes	\$70.30
Total	\$773.26

Date 2022-04-24 11:33:15**Transaction Id** 2240444003**Invoice #** 21129871003**Payment Method** Card ending 1040**Billed to**Mary Ann Mulloy-White
EZ Texting[VIEW INVOICE](#)

PDC Exhibit 5

Carole Wagner added a private note (Wed, 17 Jul 2024 at 7:05 AM)
Notified to: "PDC Support" pdc@pdc.wa.gov

External Email

Good morning,

First I would like to apologize for the delay in getting back to you.

I have been on FMLA due to a severe illness. I have also a new job that is very high stress at the moment.

What I plan on doing is contacting a firm to file our reports.

I will let you know when they have confirmed acceptance.

Again, my apologies.

Make it a great day!

Carole

PDC Exhibit 6



**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.pdca.wa.gov

August 6, 2024

Bethel Citizen's Committee for School Support
10906 152nd Street Ct E
Puyallup, WA 98374

Also delivered electronically to yesforthebond@gmail.com and carolebrent@hotmail.com

Subject: Brief Enforcement Hearing Notice; PDC Case Number 141631

Dear Bethel Citizen's Committee for School Support:

On the date below, the Public Disclosure Commission (PDC) will hold a Brief Adjudicative Proceeding (Brief Enforcement Hearing) in accordance with RCW 42.17A.110 and RCW 42.17A.755 to determine if you violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures, including expenditure details, on required reports for election year 2022 that were due to be filed in 2019, 2020, 2021 and 2022, as alleged in the complaint filed in PDC Case 141631.

Our records show that, to date, no new reports or amended reports have been filed in response to this complaint despite multiple requests from PDC staff.

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).

Your attendance at the hearing is encouraged but not required.

HEARING INFORMATION

Date and time: **Thursday, September 12, 2024 at 1PM**
Place: Remotely from Olympia
Live Audio and Online Transmission
Presiding Officer: Allen Hayward, Chair, Public Disclosure Commission
Authority: RCW 42.17A and WAC 390

ATTENDING OR PARTICIPATING IN THE HEARING VIA MICROSOFT TEAMS

The Brief Enforcement Hearing will be audio and video recorded. The Presiding Officer and PDC Staff will attend in-person or remotely via Microsoft Teams videoconferencing platform.

- **PLEASE READ the entire instructions below *prior to the day of the hearing if you plan to attend or participate via MS Teams.***

Please note that you may be prompted to download the MS Teams app or use a supported browser (Microsoft Edge or Google Chrome) for best performance.

If you wish to attend or participate in the hearing remotely, please follow the instructions below and join the meeting on a computer or mobile app **promptly by 1PM on September 12, 2024.** Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave or stay in the meeting.

Please note that you must stay muted at all times except while your case is being heard.

Join on your computer or mobile app:

<https://tinyurl.com/22drhc6z>

If you are unable to use Teams or experience technical difficulties, please call the PDC's main number 1-360-753-1111 to obtain information regarding alternate participation by telephone.

If you choose to participate in the hearing remotely, please be aware that you may be waiting in the queue for an unknown period of time while cases are being heard and you may have a limited amount of time to speak. If a lengthier response time is needed, please consider submitting written participation materials prior to the hearing (see below).

INTERPRETER

If a party or witness to this proceeding speaks limited English or is hearing-impaired, and needs an interpreter, a qualified interpreter will be appointed at no cost to you. Please inform us at least five business days before the hearing or no later than **September 5, 2024** if you require an interpreter for this proceeding and/or translation of its written materials in a language other than English. Please contact us by email at pdc@pdc.wa.gov or call us at (360) 753-1111 or 1-877-601-2828 to request an interpreter.

SUBMITTING WRITTEN MATERIALS

In advance of the Brief Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Presiding Officer, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by the PDC no later than **September 5, 2024.**

SUBMITTING THE REPORTS

You are strongly encouraged to complete and submit the required missing or amended reports [online](#) prior to the Brief Enforcement Hearing so they are *received* by the PDC no later than **September 5, 2024.** The reports must be submitted electronically and instructions are available

online. If you need help filing reports, please reach out to us *as soon as possible* so we can put you in touch with a Filer Assistance Specialist.

If you have any questions about the hearing process prior to the hearing date, please contact me by email at pdcc@pdcc.wa.gov and be sure to reference your case number in the subject line of the email.

Sincerely,

Tabatha Blacksmith
Compliance Officer
(360) 753-1111



Enclosures

- Brief Enforcement Hearings FAQ
- PDC Penalty Schedule

BRIEF ENFORCEMENT HEARINGS – INFORMATION FOR FILERS

You have received a letter or email from the PDC scheduling a Brief Enforcement Hearing before a PDC Commissioner. Here are the answers to some Frequently Asked Questions about these brief hearings. This FAQ is informational only and should not be considered legal advice.

What is a Brief Enforcement Hearing?

The PDC is responsible for enforcing the State's campaign finance laws. We may schedule what is called a Brief Enforcement Hearing (also known as a "Brief Adjudicative Proceeding" under the Administrative Procedure Act) to address compliance with campaign finance reporting requirements when evidence shows the following types of alleged violations may have occurred:

- Failure to file or timely file required reports of financial affairs, campaign contributions and/or expenditures, independent expenditures, or funds spent on lobbying;
- Improper use of public facilities or resources in election campaigns when the value of public funds expended or facilities used was minimal; and
- Infractions of political advertising laws regarding sponsor identification or political party identification.

Brief Enforcement Hearings may be scheduled on other matters as well, if the basic facts are agreed to or are not being contested, and it is anticipated that the likely penalty imposed (if a violation is found) will be \$1,000 or less. The Commission has adopted a penalty schedule for Brief Enforcement Hearings which can be found in the Washington Administrative Code [WAC 390-37-143](#).

A Presiding Officer, who is a PDC Commissioner, will conduct the hearing. PDC Staff will present the case to the Presiding Officer, and you will have an opportunity to explain the circumstances related to the alleged violations. You may do this remotely online, by telephone, in writing (by email or letter) or in person.

Who are the parties involved?

The PDC Staff initiates and investigates possible violations, and brings cases forward to the Commission or its Presiding Officer. The person who is alleged to be out of compliance with the law is referred to as the "Respondent."

What do I do to prepare for the hearing?

The brief hearings are informal in nature. You are not required to have an attorney for this hearing. Hearings take place virtually and/or in the PDC meeting room where Commission meetings are held. You need to let the staff know at least five business days before the hearing whether you will be attending or participating remotely online, by phone, in-person or prefer not to attend.

If you are having other people (witnesses) testify on your behalf, they must be available at the hearing, and staff needs to be informed of the number of witnesses and time needed for their testimony when you notify the staff of your participation. The scheduled hearing starting time is the start time for several matters that will be heard by the Presiding Officer, and your case may not be the first one heard. So you will need to remain available to participate until your case is called.

Waiving your right to participate. If you have submitted nothing in writing prior to the hearing, have made no other arrangements, and you do not appear online, by phone, in-person, or through your legal counsel at the hearing, it will be presumed that you have decided to waive your right to participate at the hearing.

What happens at the hearing?

The Presiding Officer will introduce the participants and explain the procedure for the hearing. The hearing will be audio-taped.

The Presiding Officer will swear-in PDC Staff for them to present information regarding the alleged violation of law. You will then have an opportunity to testify, which is your opportunity to present information. All testimony by staff, Respondents, and witnesses is given under oath but, if you attend in-person, you are seated at a regular meeting table with a microphone, not in a courtroom. The Presiding Officer may ask you some questions about the information you, PDC Staff, or witnesses have presented. If you have decided to participate in writing instead of online, by phone or in-person, your written information will be considered by the Presiding Officer as part of the hearing materials.

If at any time the Presiding Officer believes the alleged violations are serious enough to merit penalties greater than \$1,000, the Presiding Officer will adjourn the hearing and direct that the matter be scheduled for a hearing before the full Commission at a later time.

How is the decision made?

After considering all the information presented at the hearing, the Presiding Officer will make a decision about the allegation(s) and any appropriate penalty amount. The decision is typically announced orally at the hearing.

The Presiding Officer will use the penalty schedule referred to above that has been adopted by the Commission in rule to determine the appropriate penalty for certain types of violations, taking into account aggravating and mitigating factors. The penalty schedule is below.

What happens after my hearing?

A written decision, called an Initial Order, laying out the Presiding Officer's ruling, including the findings and the penalty, will be sent to you. The PDC tries to get orders issued within 10 days if possible, and not later than 30 days. If a monetary penalty is imposed in the Initial Order, the penalty must be paid to the **Washington State Treasurer**, and mailed to the address listed in the Order cover letter within the time frame stated in the Order.

Along with your Initial Order, you will also receive information about your appeal rights, including how to request review or reconsideration by the full Commission if you disagree with the Initial Order. Follow these procedures carefully if you wish to appeal. If there is no appeal before the PDC, the Initial Order becomes a Final Order, and further appeals must be made in Superior Court.

What are the rules that apply to the procedures of my hearing?

The PDC's laws and rules are available on the PDC's website at www.pdc.wa.gov. The laws are in the Revised Code of Washington ([RCW Chapter 42.17A](#)). The rules are in the Washington Administrative Code ([WAC Title 390](#)). Brief Adjudicative Proceedings are described at [WAC 390-37-140](#) through [390-37-150](#) and in the Administrative Procedure Act (APA) at [RCW 34.05.482-494](#).

Penalty Schedule [[WAC 390-37-143](#)]:

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:

Violation	1st Occasion	2nd Occasion	3rd Occasion
Failure to timely file an accurate and complete statement of financial affairs (F-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
Candidate's failure to timely file an accurate and complete registration statement (C-1)/statement of financial affairs (F-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 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
Failure to timely file an accurate and complete lobbyist monthly expense report (L-2):			
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
Failure to timely file an accurate and complete lobbyist employer report (L-3):			
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	\$1,00

Failure to timely file accurate and complete disclosure reports:			
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
Failure to timely file accurate and complete reports disclosing lobbying activities:			
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
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.]

PDC Exhibit 7



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

Public Disclosure Commission Statement of Understanding

Bethel Citizens for Schools Committee: PDC Case 111158

I Mary Ann Mulloy-White & Carole Wagner, as a Committee Officer for the Bethel Citizens for Schools Committee,
(Committee Officer Name) hereby acknowledge that the Committee violated the following:

RCW 42.17A.235 and **.240** by failing to timely and accurately file a Summary Full Campaign Contribution and Expenditure Report (C-4 report) as a ballot committee in support of the 2018 Bethel School District bond measure, under the Full Reporting option disclosing contribution and expenditure activities.

During calendar year 2018, the Bethel Citizens for Schools Committee, a political committee registered with the PDC under the Full Reporting option, supported Bethel School District ballot propositions for two elections. The Committee's election efforts included expenditures in support of three Bethel School District ballot propositions on the ballot during the February 13, 2018, Special Election, specifically: 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). The Committee also supported Proposition 1, a \$443 million General Obligations Bond Measure on the ballot during the November 6, 2018, General Election.

RCW 42.17A.235 and **.240** require 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.

1. 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 that \$0 monetary contributions had been received, and \$7,740.18 in expenditures were made.

2. The C-4 report disclosed 10 Committee expenditures that were all made on October 29, 2018, and included the following nine expenditures: (1) four expenditures totaling \$5,528.66 made to Always Great Graphix for Bond Campaign shirts and promotional advertising; (2) three expenditures totaling \$1,502.06 to EZ Texting to send "Robo texts to voters"; (3) a \$348.61 expenditure made to L2 Political for "Contact Information of Community"; and (4) a \$315.65 expenditure made to Sandy Williamson for "Vote Bond Card Reimbursement."
3. The 7-Day Pre-General Election C-4 report was required to have been filed no later than October 30, 2018. The 7-Day Pre-General Election C-4 report was filed seven days late by the Committee and on the date the November 6, 2018, general election was held.

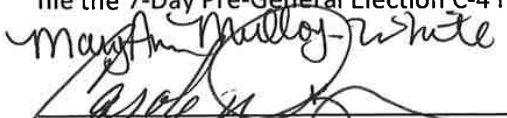
Bethel Citizens for Schools Committee (Committee) would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing) being scheduled by Public Disclosure Commission (PDC) staff.

Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, the Committee is completing this Statement of Understanding and enclosing a check or money order in the amount of \$150 as a penalty payment to resolve this matter.

The \$150 penalty assessed against the Committee includes one acknowledged violation of RCW 42.17A.235 and .240 for failing to timely file the 7-Day Pre-General Election C-4 report during the 2018 general election cycle, in accordance with WAC 390-37-143, the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings.

Bethel Citizens for Schools Committee understands that by completing this Statement of Understanding, they are acknowledging a violation of Chapter 42.17A RCW as set forth above and are waiving their right to a hearing in this matter.

Bethel Citizens for Schools Committee further understands that this will resolve the issue of failing to timely file the 7-Day Pre-General Election C-4 report during the 2018 election cycle as described above.


Bethel Citizens for Schools Committee Officer

10/20/22
10/31/22
Date Signed

Bethel Citizens for Schools Committee
Statement of Understanding
PDC Case 111158
Page 3

Please make your check or money order payable to the **"Washington State Treasurer.** And be sure to include the PDC Case number in the memorandum field, and mail or deliver this Statement of Understanding along with your payment to:

Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908





State of Washington
PUBLIC DISCLOSURE COMMISSION

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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





State of Washington
PUBLIC DISCLOSURE COMMISSION

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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 Lavallee
PDC Executive Director



cc: Bethel Citizens for School Committee