



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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December 29, 2023

Sent electronically to Raymond Shjerven II at [rshjerven@comcast.net](mailto:rshjerven@comcast.net)

Subject: Complaint regarding Council Member Jeni Woock, PDC 142931

Dear Raymond Shjerven:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against Jeni Woock on September 27, 2023. The complaint alleged that Jeni Woock, an incumbent city council member for City of Gig Harbor, in Pierce County, may have violated RCW 42.17A.555 by using a public agency, office or facilities to support the candidacy of a 2023 political candidate for city council race in the City of Gig Harbor.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegation in the complaint; the applicable statute and rule(s); the five attachments submitted with the complaint; PDC Interpretation 04-02 "Guidelines for Local Government Agencies in Election Campaigns;" the October 29, 2023, response from Jeni Woock (Respondent); 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:

- RCW 42.17A.555 requires that no elective official nor employee of his or her office nor any person appointed to or employed by any public office or agency use or authorize the use of any of the facilities of a public office or agency directly or indirectly to assist a campaign for election for any person to any office.
- The respondent has routinely and repeatedly communicated with constituents regarding city business under the banner of "*Jeni Listens*" emails that are sent using her City of Gig Harbor email address. These emails sometimes invite constituents to informal forums to discuss their concerns regarding city issues.
- On September 13, 2023, the Respondent used the title of her city council "*Jeni Listens*" communication to invite residents to a meet-and-greet session with candidate Ed Nadler, a 2023 city council candidate for City of Gig Harbor. This session was dubbed "*Jeni Listens with City Council Candidate*." The email was sent to the same distribution list as past "*Jeni Listens*" emails.
- Staff noted that the Respondent did use the "*Jeni Listens*" title, a regularly scheduled session that she hosts in her official capacity as a City of Gig Harbor council member and a title associated with her city council member official business. The look of the email communication also was substantively similar, with the same photo of the respondent and art layout used. However, a photo of the city's Civic Center was replaced

with a photo of the harbor, and the official City of Gig Harbor email and mailing address was replaced with her own private Gmail email and personal mailing address.

- In her response to the complaint, the Respondent, Jeni Woock, stated: “I have a once a month JENI Listens listening meeting with my constituents. My City of Gig Harbor told me that I could invite my email list to meet the candidate as long as I did not use city equipment, did not use a city email address, did not mention the meeting in any city function.”
- The respondent further explained that she did not use city staff to assist in drafting the email message and also notified participants at the meeting that the views expressed there were her personal ones and did not reflect any official views of the City of Gig Harbor.
- Ms. Woock has no prior PDC violations.

The Respondent used the title of “*Jeni Listens*,” a regularly scheduled session/platform she associated with her official capacity/office as a City of Gig Harbor council member and used her city email address, to promote a candidate. While no city resources were used in the distribution of the September 2023 email or the subsequent gathering, and Ms. Woock took steps to try to distinguish the communication, the average recipient of the message might have understandably concluded that the invitation was part of the respondent’s ongoing official city correspondence and activity.

Pursuant to WAC 390-37-060(1)(d), Jeni Woock will receive a formal written warning concerning the use of “*Jeni Listens*” to support a political candidate/campaign in the 2023 election year. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC law or rules.

Accordingly, 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 Erick Agina at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
Kim Bradford, Deputy Director  
For Peter Frey Lavalley, Executive Director

cc: Council Member Jeni Woock