



**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

February 9, 2024

Delivered electronically to "gmansell@washingtonea.org"

Subject: PDC Case 144263 – Washington Education Association Political Action Committee - WEA-PAC (3)

Dear WEA-PAC:

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.

This matter has been dismissed because WEA-PAC completed a Statement of Understanding (SOU) and paid a \$150 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging a violation of RCW 42.17A.235 and .240 for failing to report a debt or obligation of more than \$1,000 on its 2023, 21-day pre-general election C-4 report. The \$150 penalty assessed resolves the allegations listed in your complaint.

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.

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

Endorsed by,
Electronically Signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director



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February 9, 2024

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Washington Education Association Political Action Committee – WEA-PAC (3), PDC Case 144263

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 26, 2023. Your complaint alleged that Washington Education Association Political Action Committee (WEA-PAC) may have violated RCW 42.17A.235 and .240 by failing to report a debt or obligation for legal services, on its 21-day pre-general election C-4 report of contributions and expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by WEA-PAC; the applicable PDC reports filed by the 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:

- In August 2023, the law firm of Barnard Iglitzin & Lavitt performed legal services on behalf of Washington Education Association Political Action Committee (WEA-PAC) concerning a complaint filed with the Public Disclosure Commission.
- The law firm billed WEA-PAC for these services during the first week of September 2023.
- As of October 16, 2023, WEA-PAC had not paid for legal services it received in August or September or received an in-kind contribution for payment of the legal services.
- WEA-PAC timely filed its 21-day pre-general election C-4 report of contributions and expenditures, covering the period September 1, 2023 – October 16, 2023, on October 17, 2023. The C-4 report disclosed no debts or obligations.
- On October 18, 2023, the Washington Education Association, the entity that formed WEA-PAC and funds a majority of the PAC's activities through in-kind contributions, agreed to pay Barnard Iglitzin & Lavitt \$5,583.80 for WEA-PAC's August and September legal services. WEA-PAC reported receipt of the in-kind contribution on its 7-day pre-general election C-4 report covering the period October 17, 2023 – October 31, 2023.

Based on these findings, staff has determined that in this instance, the failure to report a debt or obligation for legal services, on its 21-day pre-general election C-4 report of contributions and expenditures, does not amount to a violation warranting further investigation.

However, WEA-PAC completed a Statement of Understanding (SOU) and paid a \$150 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging a violation of RCW 42.17A.235 and .240 for failing to report a debt or obligation of more than \$1,000 on its 2023, 21-day pre-general election C-4 report. The \$150 penalty assessed resolves the allegations in your complaint.

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@pdc.wa.gov.

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

Endorsed by,
Electronically Signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Washington Education Association Political Action Committee (WEA-PAC) (3)