



State of Washington
PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission Statement of Understanding

Snohomish Ebony PAC: PDC Case 144427

I, Christopher C. Graves, as an Officer or Committee Official for the Snohomish Ebony PAC (Committee), a continuing local political committee registered with the PDC for the 2023 election cycle, hereby acknowledge that the Committee violated the following:

1. **RCW 42.17A.235** and **.240** by failing to timely and accurately file Monetary Contributions Reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure Reports (C-4 reports) as required for a political committee participating in the 2023 primary and general elections.
2. **RCW 42.17A.260** by failing to timely file two Independent Expenditure Reports (C-6 reports) disclosing independent expenditure advertising of more than \$1,000 presented to the public within 21-days of the November 7, 2023 general election.

RCW 42.17A.235 and **.240** requires political committees participating in an election 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-Election C-4 reports.

RCW 42.17A.260 requires political committees making independent expenditure advertising of more than \$1,000 within 21-days of an election to file a C-6 report within 24 hours of presenting the independent expenditure advertisement to the public.

- The Committee has been registered and reporting with the PDC as a continuing political committee since 2020.
- Because the Committee participated in the 2023 general election, it was required to file a 21-Day Pre-General Election C-4 report on October 17, 2023, covering the period September 1 through October 16, 2023.

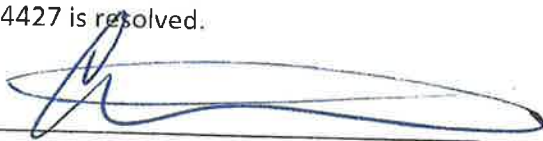
- In addition, the Committee was required to file a 7-Day Pre-General Election C-4 report on October 31, 2023, covering the period October 17 through 30, 2023, and weekly C-3 reports for the 2023 general election disclosing monetary contributions received and deposited the previous five calendar days. The Committee filed monthly C-3 and C-4 reports for all of calendar year 2023. These filed reports disclosed contribution and expenditure activities that were undertaken.
- On November 7, 2023, the Committee filed a C-4 report covering the period October 1 through October 31, 2023, disclosing \$180 in monetary contributions received, and \$16,150.58 in total Committee expenditures. The Committee expenditures included: (a) a \$7,953.12 expenditure made to "Taradel" on October 9, 2023 for an "Independent Expenditure in Everett"; (b) a \$6,316.68 expenditure made to "Taradel" on October 11, 2023 for an "Independent Expenditure in Lake Stevens"; and (c) a \$1,000 expenditure made to The Soto's Photos on October 17, 2023, for "Photography."
- Late 21-Day Pre-General Election C-4 report: The Committee's above referenced \$7,953.12 independent expenditure was made in support of Demetria Chatters, a 2023 candidate seeking election to the Everett City Council. The Committee's above referenced \$6,316.68 independent expenditure was made in support of Gloria Ngezaho, a 2023 candidate seeking election to the Lake Stevens Council. Both expenditures were required to be disclosed on October 17, 2023, on the 21-Day Pre-General Election C-4 report. That report was not filed. The \$14,269.80 for the two independent expenditure mailers was eventually disclosed, 21 days late, on November 7, 2023, the date of the general election.
- Late C-3 report: On November 7, 2023, the Committee filed a C-3 report disclosing a \$25,000 monetary contribution from the NAACP of Snohomish County that was received and deposited on September 23, 2023. The C-3 report was required to have been filed no later than September 25, 2023, and was filed 43 days late.
- Late C-6 report: On November 9, 2023, the Committee filed a C-6 report disclosing the same \$7,953.12 expenditure discussed previously. The C-6 report disclosed that the Committee sent an 18,936-piece mailer to voters on October 23, 2023. The report was due on October 24, 2023. The C-6 report was filed 16 days late, two days after the November 7, 2023 general election.

- Second late C-6 report: On November 9, 2023, the Committee also filed a C-6 report disclosing the \$6,316.38 expenditure discussed previously. The C-6 report disclosed that the Committee sent a 15,039-piece mailer to voters on October 24, 2023. The report was due on October 25, 2023. The C-6 report was filed 15 days late, two days after the November 7, 2023 general election.

The Committee would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing). Therefore, in lieu of a hearing, the Committee acknowledges it committed the four violations of Washington law described above and agrees to enter this Statement of Understanding to resolve this case with the Public Disclosure Commission (PDC).

Further, in accordance with the Penalty Schedule set forth in WAC 390-37-143, the Committee agrees to pay a \$1,000 civil penalty for violating RCW 42.17A.235, .240, and .260, that includes a \$250 violation for each of the four late filed reports, to include two late C-6 reports, one late C-3 report, and one late C-4 report.

By signing this Statement of Understanding, the Committee acknowledges that it violated RCW 42.17A.235, .240, and .260 and waives its rights to a hearing in this matter. The Committee further understands that by signing this Statement of Understanding and paying the \$1,000 civil penalty, PDC Case 144427 is resolved.


Snohomish Ebony PAC Committee Officer

Christopher C. Givens

1/24/2023
Date Signed

Please make your check or money order payable to the "**Washington State Treasurer**" and be sure to include PDC Case no. 144427 in the memorandum field. After you sign this Statement of Understanding, please mail it, or deliver in person along with your \$1,000 check or money order for the civil penalty to:

Public Disclosure Commission
711 Capitol Way, Room 206
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Olympia, WA 98504-0908



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