



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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

May 16, 2024

Sent electronically to Shannon Barnett on behalf of Woodland Citizens for Schools at [usa.barnett@gmail.com](mailto:usa.barnett@gmail.com)

Subject: Complaint filed by Codi Roy, PDC Case 149175

Dear Woodland Citizens for Schools:

Below is a copy of an electronic letter sent to Codi Roy concerning the complaint filed with the Public Disclosure Commission (PDC) on February 13, 2024.

As noted in the letter to Codi Roy, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning to the Committee concerning the failure to respond and fulfil its statutory requirement as it pertains to a public request to inspect its books of account during the 10 days preceding an election granting access to such records within 48 hours of the request for public inspection of books of account. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Accordingly, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

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

s/\_\_\_\_\_  
Peter Frey Lavalley, Executive Director





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May 16, 2024

Sent electronically to Codi Roy at [codibutler@hotmail.com](mailto:codibutler@hotmail.com)

Subject: Complaint regarding Woodland Citizens for Schools, PDC Case 149175

Dear Codi Roy:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on February 13, 2024. Your complaint alleged that Woodland Citizens for Schools, a Single Election Committee, registered with the PDC during the 2024 February special election, may have violated RCW 42.17A.235 for failure to allow public inspection of books of account.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegations listed in the complaint; the applicable statutes and rule(s); the February 24, 2024, response provided by Shannon Barnett, Treasurer; the statutory requirements pertinent to public inspection of books of account; PDC reports filed by Woodland Citizens for Schools (Committee); 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:

- On December 16, 2023, the Committee filed a Committee Registration (C-1pc) and selected the Full Reporting Option. The Committee later amended its C-1pc twice on December 18, 2023, and again on February 9, 2024.
- RCW 42.17A.235(6) and (7) require the Treasurer of a political committee to maintain accurate and current books of account. During the 10 calendar days preceding an election, the committee must make its records available for public inspection to a requester via one of the following means:
  1. By allowing in person access to records at a mutually agreed upon location between 9AM-5PM on any day within 48 hours of the requested inspection day/time (excluding Saturday, Sunday, or a legal holiday); or
  2. By providing digital access or copies of records in lieu of scheduling an in-person inspection.
- On February 7, 2024, you, Codi Roy, emailed Shannon Barnett, the Treasurer for the Committee, requesting access to the Committee's books of account. On or about February 9, 2024, you received a response from Shannon Barnett stating: "It's all detailed with PDC." You further noted in your complaint that: "That was

his complete reply. And as you know PDC website only supplies general info. I believe that as treasurer of the PAC he should have transparently communicated where/how I could actually see the details for the donor information.”

- Staff noted that the Committee, by way of its Treasurer, Shannon Barnett, failed to provide the statutory required access to its books of account by not allowing access to its records, as required by law.
- In its response to the complaint received on February 24, 2024, the Committee, by way of its Treasurer, Shannon Barnett, stated: “our opposition was wanting to see our finances and I thought that was all done as a function facilitated through the PDC. I was unaware of RCW 42.17A.235 and I did not understand why it was not visible and available through PDC as the [intermediary.]”

Based on these findings staff has determined that, in this instance, the Campaign’s failure to allow access to its books of account within 48 hours of the requested inspection day/time, does not amount to a violation warranting further investigation. It appears that the Committee was not aware of the statutory requirements to allow books of inspection to the public within 48 hours of the request being made by a member of the public.

Pursuant to WAC 390-37-060(1)(d), however, Woodland Citizens for Schools will receive a formal written warning concerning the failure to allow access to its books of account, as required by law. The formal written warning will include staff’s expectation that Woodland Citizens for Schools will provide/allow access to its books of account in the future. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws 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, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

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

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Peter Frey Lavalley, Executive Director

cc: Woodland Citizens for Schools