



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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May 24, 2024

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Woodland Citizens for Schools, PDC Case 149574

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on February 26, 2024. The complaint alleged that Woodland Citizens for Schools, a Single Election Committee registered with the PDC, may have violated RCW 42.17A.235 & .240 for failure to accurately and timely disclose contribution and expenditure reports during the 2024 February special election, including failure to properly breakdown/fully describe the purpose of committee expenditures/details on Summary, Full Report Receipts and Expenditures (C-4) reports, as required in WAC 390-16-037, during the 2020 election year and the 2024 February special election cycle.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules; the March 23 and 27, 2024, responses to the complaint provided by Shannon Barnett, Treasurer; the applicable 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.
- You alleged that the Committee failed to timely and accurately report contribution (C-3) and expenditure (C-4) reports during the 2024 February special election. You also alleged that the Committee failed to properly breakdown/fully describe the purpose of expenditures undertaken by the Committee in 2020 and 2024 February special election years. You included/attached copies of C-4 reports showing expenditures that lacked alleged proper description or breakdown of expenditures.
- Staff reviewed the attachments you submitted with the complaint and noted that there were some expenditures made by the Committee either to vendors or as in-kind contributions for which a more detailed description/purpose should have been provided, such as the number/quantity of items procured by the Committee. For example, the Committee failed to include sufficient/proper expenditure descriptions to include the quantity of items purchased for the March 10, 2020 and May 4, 2020, expenditures for "yard signs decals" and "signs banners" paid to "Advanced Electric Signs" in the amount of \$992.68 and \$64.74, respectively. The Committee also failed to include the quantity or

number of items purchased for a January 4, 2024, expenditure for “Printing literature, fliers, postcards etc.: Door hangers” paid to “Minute Man Press” in the amount of \$1,105.39. Lastly, the Committee also failed to include sufficient descriptions for two in-kind contributions received from Washington Education Association on December 22, 2023 and January 10, 2024, for “Design and Printing” and “Printed Materials,” respectively.

- In its response to the complaint, the Committee, by way of Shannon Barnett, stated: “Yes we were late. I was not on the committee back then and I don’t have access to any of their documents from 2020. I tried to find out how to log onto that year but I only see my access as 2024. I did go ahead and go through our current 2024 committee C4 reports and add all the additional details to everything I have access to for the current campaign. Specific to the carryover balance that we discussed, I have no idea why the treasurer in 2020 listed the carry over as that dollar amount. Specific to the digital sign, it was listed as an in kind contribution on Feb 8 as \$1000 for one week of digital rental for a one week period. Most of the sign and sticker details at issue were for the 2020 campaign and I simply cannot amend those. I was informed by PDC staff that in 2020 the reporting was done on software that the user downloaded and it was not online. The only way to amend those 2020 filings is to find the 2020 treasurer and see if she has the files on her computer so we can send them to PDC to be uploaded. As for the 2024 and complaint of the mysterious \$54.87 difference between 2020 and 2024...that is going to be interest earnings.”
- On April 4, 2024, the Committee filed six amended reports and filed two additional reports to better depict and correct the issues raised in your complaint for election year 2024.

Based on these findings, staff has determined that, in this instance, the Committee’s failure to timely and accurately file C-3 and C-4 reports, including failure to properly and accurately describe the purpose of the expenditures to include the number/quantity of items bought, does not amount to a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), the Committee will receive a formal written warning concerning its failure to timely/accurately disclose C-3/C-4 reports and properly breakdown/describe the purpose of expenditures on C-4 reports in the 2024 election years. The Committee will be informed the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/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 email at pdcc@pdc.wa.gov

Sincerely,

Endorsed by:

s/_____

s/_____

Erick O. Agina, Compliance Officer

Peter Frey Lavalley, Executive Director

cc: Woodland Citizens for Schools