

<b>Respondent Names</b>
Woodland Citizens for Schools PAC
<b>Complainant Name</b>
Glen Morgan
<b>Complaint Description</b>
<p>Glen Morgan</p> <p>Mon, 26 Feb 2024 at 2:32 PM</p> <p>To whom it may concern,</p> <p>It has recently come to my attention that the Woodland Citizens for Schools PAC has committed a variety of violations of Washington State’s campaign finance laws (RCW 42.17A) during their recent 2024 special election levy campaign earlier this month. The violations are as follows:</p> <p>1) Failure to report source of secret contributions (Violation of RCW 42.17A.240, .235)</p> <p>This is a continuing PAC that began the recent political campaign with \$1,800.13 (See attached final 2020 C4, line 18, PDC Tracking # 100974214, attached for staff reference). However, with the extremely late first C4 report filed for the 2024 Levy campaign by this same PAC, they start out with a balance of \$1,853.00, and this appears to include a secret contribution of \$52.87. Where did this secret contribution come from? Clearly they need to report the true source of these secret, mystery funds.</p> <p>2) Failure to timely file contribution and expenditure reports (Violation of RCW 42.17A.240, .235)</p> <p>Every report filed by this well-funded PAC appears to be filed late. Months of expenditures and contributions were concealed from the public until just a few days before the election. In fact, it appears this secretive PAC had planned to keep all this information concealed from the public until a local resident attempted to inspect this campaign books (an effort, that I am told was refused by this PAC, which is a separate violation – I’ve encouraged the local citizen to file their own complaint on that one).</p> <p>Regardless of what triggered the egregiously illegally late reporting, this is a clear violation of the law. In addition, the 21-day and 7-day report were also not timely filed. This is an experienced PAC with strong support for deep-pocket donors like the Washington Education Association PAC. They clearly have the resources to comply with the law. They just willfully failed to do so.</p> <p>3) Failure to provide legally required details on most expenditures (Violation of RCW 42.17A.240, . 235, WAC 390-16-037, example B)</p>

In every instance where this well-funded PAC made expenditures which included signs, mailers, and brochures, they failed to provide the legally required details as clearly explained in WAC 390-16-037, example B. All these reports will need to be correct. Lest there be any confusion, the following reports are lacking the legally required details:

Report # 110200653 (signs, door hangers, plus the WEA printed materials) – attached for staff reference

Report # 100963298 (signs – not clear what the “decals” really refers to) – 2020 campaign – attached

3) Apparent attempt to conceal expenditures or a failure to report expenditures (Violation of RCW 42.17A.240, .235)

There was also at least one electronic billboard this campaign was funding (or it was an in-kind contribution to the campaign. I’ve attached a few photos of this which were taken during the campaign. It was clearly indicating to vote Yes, so it should have been reported as a campaign expenditure.

There may have been additional expenditures unreported. I’ve included some random photos from the recent campaign, and the campaign can clarify which ones were reported on which line item and which one were not.

Clearly, with \$18,000 expenditures concealed from the public for the majority of this multi-month campaign, and with substantial support from the Washington Education Association PAC (itself a prolific violator of Washington State’s campaign finance laws – See PDC enforcement case #144263 (settlement attached for reference), PDC Enforcement Case #141529 – still an open and ongoing investigation, and additional PDC Enforcement Settlement attached), this PAC has plenty of financial support and expertise to follow the law. While it could be that the WEA spends it’s resources helping people break the law, judging from their past behavior, this is still no excuse for this local PAC to break the law on their own.

Feel free to let me know if you need any additional information on this one.

Best Regards,

Glen Morgan

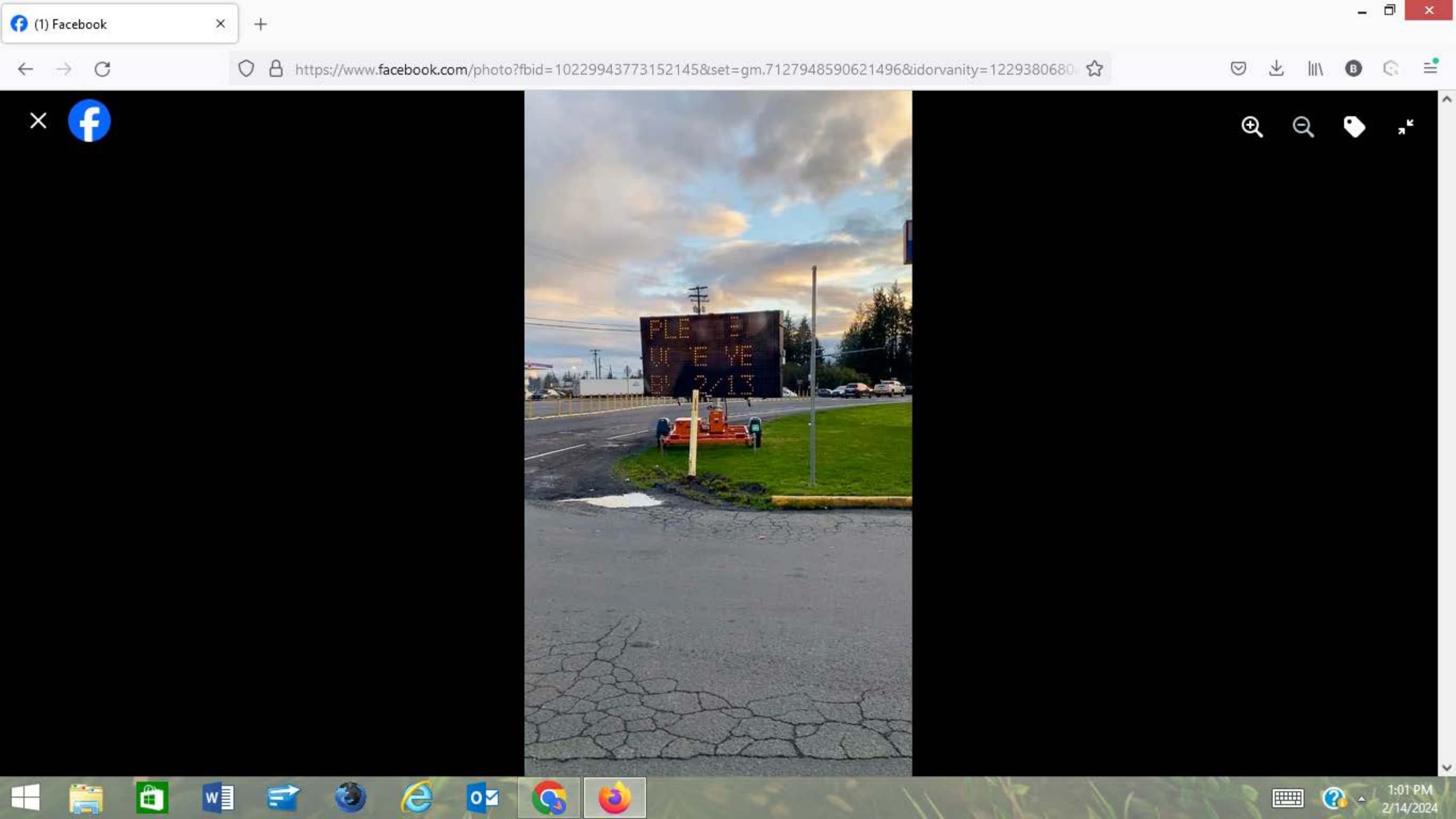
**What impact does the alleged violation(s) have on the public?**

The public has a right to know when special interests and prolific violators of Washington State's campaign finance laws like the Washington Education Association are involved in secretive local political campaigns to extract taxpayer funds during a special election. When a local PAC conceals everything from the public until just a few days before the election, they need to be held accountable.

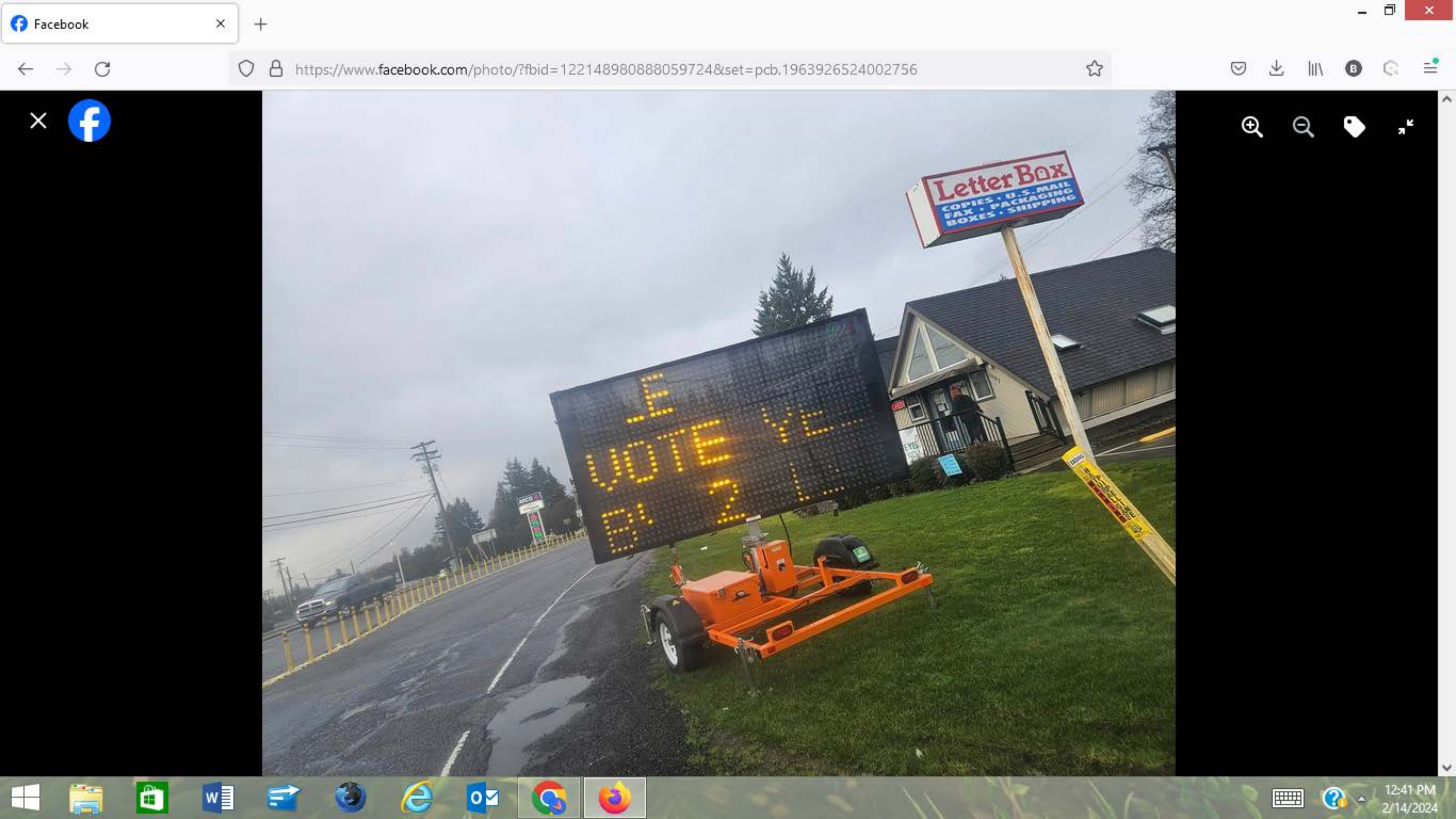
**List of attached evidence or contact information where evidence may be found**

All referenced and attached

<b>List of potential witnesses with contact information to reach them</b>
Everyone associated with this PAC as an officer and treasurer as well as the WEA crew who probably helped them violate the law
<b>Certification (Complainant)</b>
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.







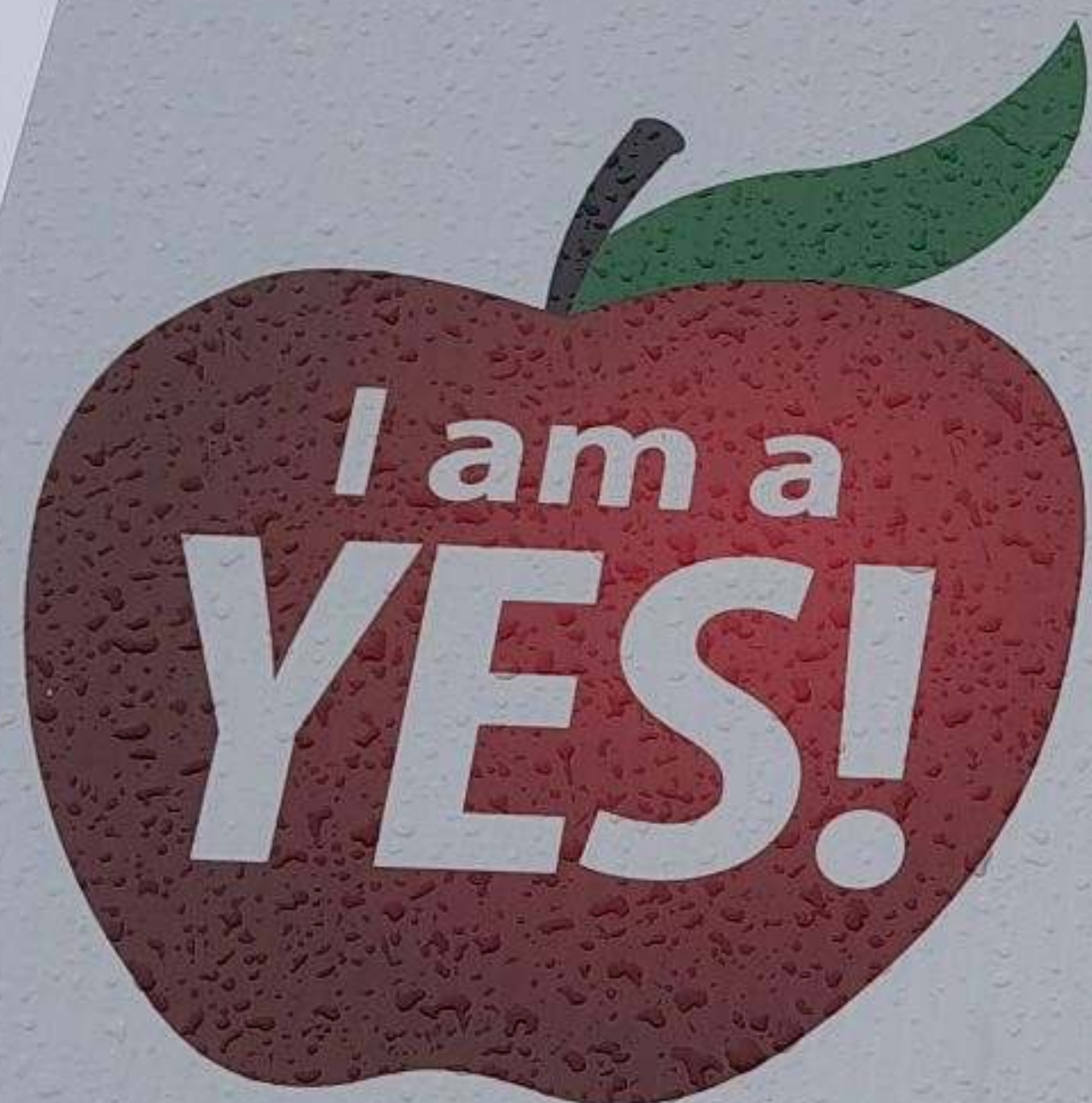


**VOTE YES**

**FOR KIDS**

*PAID FOR BY WOODLAND CITIZENS FOR SCHOOLS*





VOTE YES<sup>✓</sup>  
FOR KIDS!

Vote **YES** for Woodland Public Schools!

PAID FOR BY WOODLAND CITIZENS FOR SCHOOLS



for our **education**  
for our **future**  
for our **growth**

**VOTE YES FOR KIDS**

for our **community**  
for our **safety**  
for our **success**

PAID FOR BY WOODLAND CITIZENS FOR SCHOOLS



# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
 100963298  
 04-09-2020

Candidate or Committee Name (Do not abbreviate. Include full name) <b>Woodland Citizens for Schools</b>			
Mailing Address <b>1087 LewisRiver Rd. Box 281</b>		City <b>Woodland, WA</b>	
Zip + 4 <b>98674</b>	Office Sought (Candidates)	Election Date <b>2020</b>	<b>*For PACs, Parties &amp; Caucus Committees:</b> During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate</u> ?
Report Period Covered <b>03/01/20</b>	From (last C-4) To (end of period) <b>03/31/20</b>	Final Report? Yes No <b>X</b>	

## RECEIPTS

\*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	\$	<b>\$3,399.00</b>
2. Cash received (From line 2, Schedule A) .....	\$	<b>\$795.00</b>
3. In kind contributions received (From line 1, Schedule B) .....		<b>\$0.00</b>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....		<b>\$795.00</b>
5. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-)	<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....		<b>\$4,194.00</b>
9. Total pledge payments due (From line 2, Schedule B) .....	<b>\$0.00</b>	

## EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		<b>\$0.00</b>
11. Total cash expenditures (From line 4, Schedule A) .....		<b>\$992.68</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....		<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....		<b>\$992.68</b>
14. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....		<b>\$992.68</b>

<b>CANDIDATES ONLY</b> <table style="width:100%;"> <tr> <th></th> <th>Won</th> <th>Lost</th> <th>Unopposed</th> <th>Name not on ballot</th> </tr> <tr> <td>Primary election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>General election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <b>Treasurer's Daytime Telephone No.:</b> <b>(360) 953-2220</b>		Won	Lost	Unopposed	Name not on ballot	Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>CASH SUMMARY</b> 18. Cash on hand (Line 8 minus line 17) ..... <b>\$3,201.32</b> <small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small> 19. Liabilities: (Sum of loans and debts owed) ..... <b>\$0.00</b> 20. Balance (Surplus or deficit) (Line 18 minus line 19) ..... <b>\$3,201.32</b>
	Won	Lost	Unopposed	Name not on ballot												
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		<b>Sarah Hadaller</b>	<b>04/09/20</b>

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

**A**  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

03/01/20

03/31/20

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
03/05/2020	\$795.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$795.00**

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

### 3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
03/10/20	ADVANCED ELECTRIC SIGNS 1550 DOWNRIVER DRIVE WOODLAND, WA 98674		YARD SIGNS DECALS	\$992.68

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ **\$0.00**

Enter also on line 11 of C4 \$ **\$992.68**

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
 100974214  
 06-09-2020

Candidate or Committee Name (Do not abbreviate. Include full name) <b>Woodland Citizens for Schools</b>			
Mailing Address <b>1087 LewisRiver Rd. Box 281</b>		City <b>Woodland, WA</b>	
Zip + 4 <b>98674</b>	Office Sought (Candidates)	Election Date <b>2020</b>	<b>*For PACs, Parties &amp; Caucus Committees:</b> During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate</u> ?
Report Period Covered <b>05/01/20</b>	From (last C-4) <b>05/01/20</b>	To (end of period) <b>05/31/20</b>	

## RECEIPTS

\*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	\$	<b>\$5,244.00</b>
2. Cash received (From line 2, Schedule A) .....	\$	<b>\$0.00</b>
3. In kind contributions received (From line 1, Schedule B) .....		<b>\$0.00</b>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....		<b>\$0.00</b>
5. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-)	<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....		<b>\$5,244.00</b>
9. Total pledge payments due (From line 2, Schedule B) .....	<b>\$0.00</b>	

## EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		<b>\$3,379.13</b>
11. Total cash expenditures (From line 4, Schedule A) .....		<b>\$64.74</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....		<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....		<b>\$64.74</b>
14. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....		<b>\$3,443.87</b>

<b>CANDIDATES ONLY</b> <table style="width:100%;"> <tr> <th></th> <th>Won</th> <th>Lost</th> <th>Unopposed</th> <th>Name not on ballot</th> </tr> <tr> <td>Primary election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>General election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <b>Treasurer's Daytime Telephone No.:</b> <b>(360) 953-2220</b>		Won	Lost	Unopposed	Name not on ballot	Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>CASH SUMMARY</b> 18. Cash on hand (Line 8 minus line 17) ..... <b>\$1,800.13</b> <small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small> 19. Liabilities: (Sum of loans and debts owed) ..... <b>\$0.00</b> 20. Balance (Surplus or deficit) (Line 18 minus line 19) ..... <b>\$1,800.13</b>
	Won	Lost	Unopposed	Name not on ballot												
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		<b>Sarah Hadaller</b>	<b>06/09/20</b>



# CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

**A**  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

05/01/20

05/31/20

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$0.00**

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

### 3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
05/04/20	ADVANCED ELECTRIC SIGNS 1550 DOWNRIVER DRIVE WOODLAND, WA 98674		SIGNS / BANNERS	\$64.74

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ **\$0.00**

Enter also on line 11 of C4 \$ **\$64.74**



711 Capitol Way Suite 206  
PO Box 40908 Olympia, WA 98504-0908  
(360) 753-1111  
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

Woodland Citizens For Schools

1087 Lewis River Rd #281  
Woodland, WA 98674

Coverage: 12/11/2023 to 01/22/2024

Final report: No

Report number: 110200653

Election year: 2024

Date submitted: 02/09/2024

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$1,853.00
2. Cash received (Schedule A line 1).	\$6,460.00	
3. In-kind contributions received (Line 1 schedule B).	\$7,769.76	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$14,229.76
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$16,082.76
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$1,460.82	
12. In-kind expenditures (Line 1 schedule B).	\$7,769.76	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$9,230.58
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$9,230.58

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$6,852.18
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$6,852.18

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Shannon Barnett - 02/09/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
01/16/2024	\$6,460.00				

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$6,460.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$0.00
12/20/2023	office max 8812 ne 5th ave , vancouver, WA 98665	Printing campaign signs: print of signs		\$355.43
01/04/2024	Minute Man Press 302 NE 6th Ave , Camas, WA 98607	Printing literature, fliers, postcards, etc. : Door hangers		\$1,105.39
			\$0.00	\$1,460.82

4. TOTAL EXPENDITURES: \$1,460.82

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

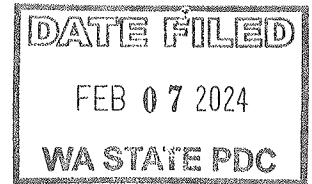
Date Received	Contributor	Employer/Occupation	Description	Amount
12/22/2023	Washington Education Association 32032 weyerhaeuser way s , Federal Way, WA 98001		Design and Printing	Fair market value: \$7,446.00 Aggregate total (N): \$7,769.76
01/10/2024	Washington Education Association 32032 weyerhaeuser way s , Federal Way, WA 98001		Printed materials	Fair market value: \$323.76 Aggregate total (N): \$7,769.76

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period



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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

**Public Disclosure Commission Statement of Understanding  
Washington Education Association PAC (3)  
PDC Cases 144263**

I, Aimee Iverson, Secretary/Treasurer for Washington Education Association Political Action Committee (WEA-PAC), hereby acknowledge that during 2023, WEA-PAC violated RCW 42.17A.235 and RCW 42.17A.240 by failing to report an outstanding debt of more than \$1,000 for legal services incurred on its Campaign Summary Receipts & Expenditures report (PDC Form C-4) covering the period 9/1/2023 – 10/16/2023.

The facts are as follows:

- The campaign's C-4 report covering the period 9/1/2023 – 10/16/2023 (the 21-day pre-general election C-4 Report), timely filed on 10/17/2023, included no amount for debts and obligations.
- The C-4 report was required to include an outstanding debt in the amount of \$5,583.80 owed to the law firm of Barnard Iglitzin & Lavitt for legal services provided to the PAC in August and September 2023 to address prior complaints filed with the Public Disclosure Commission.
- In accordance with WAC 390-16-042 the portion of the outstanding debt related to August legal services was not required to be reported on the August 2023 C-4 report but was required to be reported on the 21-day pre-general election C-4 report along with the September legal services.
- The 21-day pre-general election C-4 report deprived the public of information concerning the PAC's debts and obligations.

I would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding. Therefore, in lieu of PDC staff scheduling a hearing, I am entering into this *Statement of Understanding* (SOU) to resolve this matter.

In accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143, I agree to the assessment of a \$150 penalty for the acknowledged violation of RCW 42.17A.235 and .240 for failing to include an outstanding debt for legal services on the C-4 report covering the 21-day pre-general election period of 9/1/2023 – 10/16/2023.

I understand that, by completing this SOU, I acknowledge the violations of Chapter 42.17A RCW and Title 390 WAC set forth above and waive my right to a hearing in this matter. I further understand that signing this SOU and returning it to the PDC with a payment for the \$150 civil penalty will resolve the issue of the inaccurate C-4 report for election year 2023 indicated above.



2/7/24

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Aimee Iverson, Secretary/Treasurer, WEA-PAC

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Date Signed

Please make your check or money order payable to the “**Washington State Treasurer**” and be sure to include the PDC Case Number (144263) in the memorandum field.

Kindly mail or deliver this SOU and your payment to one of the following addresses by no later than **Friday, February 9, 2024**.

Regular mail:

**Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504-0908**

Overnight mail or in-person delivery:

**Public Disclosure Commission  
711 Capitol Way S, STE 206  
Olympia, WA 98501-1267**

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**SUPERIOR COURT OF THE STATE OF WASHINGTON  
THURSTON COUNTY**

STATE OF WASHINGTON ex rel. GLEN  
MORGAN,

Plaintiff,

vs.

WASHINGTON EDUCATION  
ASSOCIATION POLITICAL ACTION  
COMMITTEE, and WASHINGTON  
EDUCATION ASSOCIATION,

Defendants.

**NO. 18-2-02884-34**

**STIPULATION AND AGREED JUDGMENT**

**[CLERK'S ACTION REQUIRED]**

**JUDGMENT SUMMARY**

JUDGEMENT CREDITOR:	State of Washington
JUDGEMENT DEBTOR/S:	WASHINGTON EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE, a Washington Registered Political Committee and WASHINGTON EDUCATION ASSOCIATION
PRINCIPAL JUDGMENT:	\$16,438.00 with \$14,749.20 suspended for a period of three (3) years contingent upon no findings of violations of RCW 42.17A committed during the suspension period.



INTEREST:	No prejudgment interest is owed. Principal judgement amount(s) due and owing shall not bear interest unless the principal judgment unpaid by the due date specified herein. In the event that payment is not made by the due date; the principal judgement shall bear interest at 12 percent per annum.
COSTS AND FEES:	\$2,916.08 in attorney's fees and costs.
ATTORNEY JUDGMENT CREDITOR:	Office of the Attorney General
ATTORNEY JUDGEMENT DEBTOR:	Harriet Strasberg Attorney at Law

### STIPULATION

The parties to this stipulation, Plaintiff STATE OF WASHINGTON, ex rel. GLEN MORGAN ("STATE"), and Defendants, WASHINGTON EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE ("COMMITTEE"), a Washington Registered Political Committee, which acts as the political wing of the Defendant, WASHINGTON EDUCATION ASSOCIATION ("ASSOCIATION"); desiring to resolve all claims arising out of the State's complaint, hereby enter the following stipulation:

1. For the purposes of Settlement, the Parties have agreed that the Defendants will not admit to violations of Ch. 42.17A RCW during calendar years 2016, 2017 and 2018.

- 1 2. For the purposes of this Stipulation and Judgement, the Parties agree that there are  
2 no outstanding C-3 Reports and C-4 Reports outstanding at the time of the entry of  
3 this Stipulation and Judgment.
- 4 3. The Defendants, through their executive director agrees to watch completely the  
5 videos "DC Campaign Finance Rules for Candidates and Political Committees, and  
6 "PDC – How to use ORCA for Campaign Finance Reporting" (both available on the  
7 Public Disclosure Commission ("PDC") Website); or alternatively attend a one-day  
8 training seminar put by the PDC for campaign finance rules and reporting within 90  
9 days of the entry of the Judgement. Defendants executive director will provide  
10 signed affidavits to either watching of the identified videos or attendance at the  
11 identified training seminar within 90 days of the entry of the Judgement.
- 12 4. Defendants, jointly and severally, agree to pay an assessed civil penalty to the state  
13 in the amount of \$16,438.00.
- 14 5. The Parties agree that \$14,749.20 of the assessed civil penalty (90%) will be  
15 suspended on the following terms and conditions:
- 16 a. The suspension will be in effect for four (3) years from the date of entry of  
17 the Judgement. During the period of suspension, Defendants each agree that  
18 they will not violate any provision of Ch. 42.17A RCW.
- 19 b. In the event that any of the Defendants, are found by the PDC or a court to  
20 have committed more than a *de minimis* violation of Ch. 24.17A RCW during  
21 the suspension period, the suspended penalty of \$14,749.20 will become  
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1 immediately due and payable to the State within 30 days of such finding  
2 without further intervention of the Court.

3 c. In the event that the Defendants are not found by the PDC or a court to have  
4 committed violation of Ch. 24.17A RCW for conduct occurring during the  
5 suspension period, then the suspended portion of the penalty will be set  
6 aside.  
7

8 d. If the Defendants fail to pay any portion of the unsuspended civil penalty,  
9 attorney fees, or costs, the suspended civil penalty of \$14,749.20 will become  
10 immediately due and payable within 30 days of such finding without further  
11 intervention of the Court.  
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13 e. If the Defendants fail to comply with their obligations under Section (2) and  
14 (3) of the above Stipulation, the suspended civil penalty of \$14,749.20 will  
15 become immediately due and payable within 30 days of such finding without  
16 further intervention of the Court.  
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18 6. Defendants agree to pay the State the unsuspended portion of the civil penalty  
19 \$1,643.80 within 30 days from the date of entry of this Stipulation and Judgment.

20 7. Defendants agree to pay by separate transmittal, \$2,916.08 in attorney fees and  
21 costs in this legal action, to Plaintiff's counsel, Possinger Law Group, PLLC, within 30  
22 days of the entry of this Stipulation and Judgment.  
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25 DATED this \_\_\_\_\_ day of September, 2019.  
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POSSINGER LAW GROUP, PLLC

Harriet Strasberg  
Attorney at Law

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Jeffrey Possinger  
WSBA# 30854  
Attorney for Plaintiff

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Harriet Strasberg  
WSBA No. 15890  
Attorney for Defendants

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

**JUDGMENT**

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court, Plaintiff, STATE OF WASHINGTON, ex. rel. GLEN MORGAN ("STATE"), appearing through its attorney of record, Jeffrey Possinger of Possinger Law Group, PLLC, and Defendants, WASHINGTON EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE ("COMMITTEE"), a Washington Registered Political Committee, which acts as the political wing of the Defendant, WASHINGTON EDUCATION ASSOCIATION ("ASSOCIATION");,

1 appearing through their attorney of records Harriet Strasberg, Attorney at Law, apprised  
2 the Court of their agreement to the entry of Judgement for the purpose of settling and  
3 compromising this action brought under Ch. 42.17A RCW. The Court, having reviewed the  
4 records and files herein, and having found the settlement between the Parties to be a just  
5 and proper resolution of this matter, and being otherwise fully advised in the premises,  
6 hereby ORDERS the following:  
7

- 8 1. The Defendants will file all outstanding C-3 Reports and C-4 Reports, if any, within  
9 30 days of the entry of this Stipulation and Judgment.
- 10 2. The Defendant, Washington Education Association, through their executive  
11 director, Armand Tiberio (also the Treasurer of Washington Education Association  
12 Political Action Committee), shall watch completely the videos "DC Campaign  
13 Finance Rules for Candidates and Political Committees, and "PDC - How to use  
14 ORCA for Campaign Finance Reporting" (both available on the Public Disclosure  
15 Commission ("PDC") Website); or alternatively attend a one-day training seminar put  
16 by the PDC for campaign finance rules and reporting within 90 days of the entry of  
17 the Judgement. Defendants executive director/treasurer will provide a signed  
18 certification to either watching of the identified videos or attendance at the  
19 identified training seminar within 90 days of the entry of the Judgement. Such  
20 certification shall be provided to plaintiff's counsel by regular first class mail and/or  
21 electronic mail within the specified time frames.  
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3. Defendants, are hereby, jointly and severally, assessed a civil penalty, in the amount of \$16,438.00 payable to the State of Washington.
4. Of the assessed civil penalty, set out above, \$14,749.20 of this amount is hereby suspended upon Defendants compliance with the following court-ordered conditions:
- a. The suspension will be in effect for four (3) years from the date of entry of the Judgement. During the period of suspension, Defendants each agree that they will not violate any provision of Ch. 42.17A RCW.
  - b. In the event that any of the Defendants, are found by the PDC or a court to have committed more than a *de minimis* violation of Ch. 42.17A RCW during the suspension period, the suspended penalty of \$14,749.20 will become immediately due and payable to the State within 30 days of such finding without further intervention of the Court.
  - c. In the event that the Defendants are not found by the PDC or a court to have committed violation of Ch. 24.17A RCW for conduct occurring during the suspension period, then the suspended portion of the penalty will be set aside.
  - d. If the Defendants fail to pay any portion of the suspended civil penalty, attorney fees, or costs, the suspended civil penalty of

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\$14,749.20 will become immediately due and payable within 30 days of such finding without further intervention of the Court.

e. If the Defendants fail to comply with their obligations under Section (2) and (3) of the above Stipulation, the suspended civil penalty of \$14,749.20 will become immediately due and payable within 30 days of such finding without further intervention of the Court.

5. Defendants agree to pay the State the unsuspended portion of the civil penalty \$1,643.80 within 30 days from the date of entry of this Judgment.

6. No prejudgment interest is owed on this Judgment. Principal Judgment amounts due and owing shall not bear interest unless the Principal Judgment is unpaid by the Defendants by the due dates specified in this Judgment. In the event that payments are not made by the due date specified; the Principal Judgment shall bear interest at a rate of 12 percent per annum.

7. Defendants agree to pay Plaintiff's counsel, Possinger Law Group, PLLC, \$2,916.08 in attorney fees costs within 30 days of the entry of this Judgment.

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DONE IN OPEN COURT this \_\_\_\_\_ day of \_\_\_\_\_ 2019.

\_\_\_\_\_  
SUPERIOR COURT JUDGE/COMMISSIONER

Presented by:

Approved as to form, Notice of  
Presentation waived.

POSSINGER LAW GROUP, PLLC

HARRIET STRASBERG,  
ATTORNEY AT LAW

\_\_\_\_\_  
Jeffrey Possinger  
WSBA# 30854  
Attorney for Plaintiff

\_\_\_\_\_  
Harriet Strasberg  
WSBA# 15890  
Attorney for Defendants