



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 • Website: www.pdc.wa.gov

Memorandum

To: Public Disclosure Commission
From: Tabatha Blacksmith, Compliance Officer
Date: September 12, 2024
Subject: Doug Weis Brief Adjudicative Proceeding (Brief Enforcement Hearing)
Memorandum: PDC Case 151234

Allegations

Public Disclosure Commission (PDC) staff alleges that Doug Weis, 2023 candidate for School Director of Cle Elum-Roslyn School District 404, violated RCW 42.17A.235 and RCW 42.17A.240 by failing timely and accurately file C-3 reports and C-4 reports disclosing contributions and expenditures undertaken by the campaign.

Background

- Doug Weis (the “Respondent”) was a candidate for School Director of Cle Elum-Roslyn School District 4040 in election year 2023. Election records show there was no candidate filing fee associated with this position. The Respondent filed a *Candidate Registration* (C-1 report) with the PDC on June 18, 2023 and selected the Full Reporting option. The report was amended with no changes on July 7, 2023. (**Exhibit 1**)
- Pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#), a candidate that selects the Full Reporting option on their C-1 report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports). The due dates for these reports are based upon the election cycle, the committee’s election participation, and their financial activity.
- As a 2023 candidate participating in the August 1, 2023 Primary Election, the Respondent was required to file the following reports by the following dates:
 - A 21-day pre-Primary C-4 report (covering 6/1/23-7/11/23) was due July 12, 2023;
 - A 7-day pre-Primary C-4 report (covering 7/12/23-7/24/23) was due July 25, 2023;
 - and

- A post-Primary C-4 report (covering 7/25/23-8/31/23) was due September 11, 2023.

If any monetary contributions were received by the campaign, weekly C-3 reports were also due by the Monday following each deposit made.

- The Respondent participated in the August 1, 2023 Primary Election but did not advance to the General Election.
- On April 5, 2024, PDC staff opened a case for the Respondent based upon a complaint filed by Conner Edwards alleging the Respondent failed to file the required 21-day pre-Primary, 7-day pre-Primary and post-Primary C-4 reports for 2023. (**Exhibit 2**)
- A Case Status Review (Initial Hearing) was held for this case on May 13, 2024.
- PDC staff reached out to the Respondent by email on May 30, 2024 and July 9, 2024 encouraging him to file the missing reports. Staff also tried to reach the Respondent by telephone at five different telephone numbers on July 24, 2024 and was able to leave three voice mail messages.
- On August 6, 2024, PDC staff served the Respondent, by email and mail, with a hearing notice for a September 12, 2024 Brief Adjudicative Proceeding (Brief Enforcement Hearing) before a Presiding Officer of the Public Disclosure Commission concerning his failure to file the required 21-day pre-Primary, 7-day pre-Primary and post-Primary C-4 reports for 2023. The notice was emailed to the Respondent's personal email address of record and mailed to the address shown on his C-1 report, as well as two additional addresses. (**Exhibit 3**)
- The Respondent's Treasurer and spouse, Susie Weis, contacted PDC staff by telephone on August 12, 2024 and said they had received our Hearing Notice. She provided her email address and asked staff to copy her on future emails to the Respondent. Ms. Weis indicated her belief that she had filed the missing reports. She said she would check the campaign's account in the ORCA online filing system and make sure the reports were filed. The Treasurer stated the Respondent's only expenditure consisted of an advertisement he paid for himself. PDC staff encouraged the campaign to file reports and submit a written response to the complaint allegation.
- PDC staff sent a follow up email on August 19, 2024 inquiring about the status of the missing reports. Ms. Weis responded by telephone the next day (8/20) indicating she was having trouble accessing the campaign's ORCA account. Mr. Weis emailed the PDC the same day and our Filer Assistance staff added Ms. Weis' email address as an authorized user on the account.
- As of August 30, 2024, the Respondent has not filed the required pre-election and post-election C-4 reports that were due in July and August of 2023.

Mitigating and Aggravating Factors

[WAC 390-37-061\(4\)](#) sets forth factors that may be considered when resolving minor violations, six of which appear to apply in this case:

- Mitigating factor: The Respondent appears to be a first-time candidate.
- Mitigating factor: The campaign appears to be relatively small or unsophisticated.
- Potential mitigating factor (unconfirmed): If the total expenditures made by the Respondent's campaign were relatively modest, this would be a mitigating factor. However, expenditure information has not been reported by the campaign.
- Potential mitigating factor (unconfirmed): It is unclear if the campaign is still experiencing any technical issues that frustrate compliance.
- Aggravating factor: Noncompliance concerns pre-election reports, which deprived the public of timely information during a time-sensitive period prior to the 2023 Primary Election.
- Potential aggravating factor (to be determined): If the required missing reports are not filed by the date of the Brief Enforcement Hearing, this would be an aggravating factor.
- Aggravating factor: The Respondent has one prior occasion of a violation of RCW 42.17A.700 within the last five years for failure to timely file a *Personal Financial Affairs Statement* (F-1 report) within two weeks of his 2023 candidacy (PDC Case 138735). The F-1 report was filed late on 7/7/23 and the case was resolved on 7/13/23 via the Respondent's submission of a signed *Statement of Understanding* and a \$100 penalty. (**Exhibit 4**)

Occasion and Penalty Schedule

If the Presiding Officer finds the Respondent violated RCW 42.17A.235 and RCW 42.17A.240 at this Brief Adjudicative Proceeding (Brief Enforcement Hearing), it will constitute his first occasion of a violation of .235 and .240.

The penalty schedule for Brief Enforcement Hearings is found in [WAC 390-37-182](#).

Exhibit List:

Exhibit 1 – PDC Case 151234 – *Candidate Registration* (C-1 report) amended July 7, 2023
Exhibit 2 – PDC Case 151234 – Complaint from Conner Edwards, dated February 20, 2024
Exhibit 3 – PDC Case 151234 – Brief Enforcement Hearing Notice, served August 6, 2024
Exhibit 4 – PDC Case 138735 – *Statement of Understanding* (SOU), signed July 7, 2023

PDC Exhibit 1



Registration (C-1): 07/07/2023

Doug Weis

Douglas Weis
PO Box 1427
Ronald, WA 98940
dougw@inlandnet.com
5096749097

Registration Filed

Candidate
Full Reporting
Submitted date: 07/07/2023
Certified by dougw@inlandnet.com
2023
WEISD--770

Candidacy

Doug Weis
Cle Elum-roslyn Sd 404
School Director
Position TBD
dougw@inlandnet.com

Bank Information

Cashmere Valley Bank
820 W. 1st
Cle Elum, WA 98922
To schedule books review contact dougw@inlandnet.com

Officers

Susie Weis

Treasurer
PO Box 1427
Ronald, WA 98940
dougw@inlandnet.com
5096749097

Attachments

Name	Description

PDC Exhibit 2

Respondent Name
Doug Weis
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Tue, 20 Feb 2024 at 3:25 PM)</p> <p>Description of Complaint</p> <p>This candidate failed to timely file the required 21-day pre-primary C4 report, the required 7-day pre-primary C4 report, and the required post-primary C4 report.</p> <p>By any objective measure, it is unacceptable that the PDC would take no action to help bring this filer into compliance now that the statute of limitations is rapidly approaching. The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of candidates and enforce filing requirements damages both the public and the candidates themselves.</p> <p>I have tried many different times to get the PDC to take action on this type of issue with no tangible results whatsoever. At one point, I believe the agency discussed the possibility of internally flagging non-filers in the PDC's system and proactively reaching out to them to bring them into compliance, but it appears this is not happening.</p> <p>Having exhausted all of my other options to pursue reform, the only remaining option available to me to compel the agency to take action here is to file PDC complaints against these noncompliant filers in an effort to force the agency to take action.</p> <p>By highlighting the agency's failure to meaningfully enforce current reporting deadlines, my hope is that the agency will look to improve its own enforcement procedures and help candidates and treasurers comply with the law.</p> <p>Notice to Respondents:</p> <p>I apologize to you for any inconvenience caused by this complaint; it is not my intention.</p> <p>No campaign treasurer or campaign/committee is perfect. Trying to comply with the myriad of requirements and deadlines the PDC enforces can be extremely difficult, even for those who have been doing this for years. The agency could adopt any number of strategies to help filers "get it right" when it comes to deadlines and other requirements. Some of these strategies might include: a) automated electronic filing reminders to a filer when they have missed a deadline, b) mandatory attendance in a PDC training course before a person is allowed to serve as treasurer, c) giving filers 48 hours to file 21- & 7-day pre-election reports as opposed to the 24 hours candidates currently get, and d) improvements to the ORCA online campaign finance filing system to improve useability.</p> <p>In my opinion, the agency has failed to provide many filers with the knowledge and tools that they need to file reports on time and be compliant.</p> <p>If you are confused by the filing requirements that the agency enforces or are experiencing technical difficulties and/or usability issues with the ORCA system, please be sure to indicate this in your response to the PDC: your comments will provide valuable feedback for the agency.</p>
What impact does the alleged violation(s) have on the public?
<p>Because this candidate has not timely filed one or more required reports, members of the public are unable to view up to date financial information, significantly reducing transparency available to voters.</p> <p>The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of candidates and enforce filing requirements damages both the public and the candidates themselves.</p> <p>It is imperative that PDC staff reach out to this candidate immediately to bring them into compliance.</p>
List of attached evidence or contact information where evidence may be found
PDC Website.
List of potential witnesses with contact information to reach them

See respondent contact info on PDC website.

Certification (Complainant)

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.



Doug Weis

Douglas Weis
PO Box 1427
Ronald, WA 98940
dougw@inlandnet.com
5096749097

Registration Filed

Candidate
Full Reporting
Submitted date: 07/07/2023
Certified by dougw@inlandnet.com
2023
WEISD--770

Candidacy

Doug Weis
Cle Elum-roslyn Sd 404
School Director
Position TBD
dougw@inlandnet.com

Bank Information

Cashmere Valley Bank
820 W. 1st
Cle Elum, WA 98922
To schedule books review contact dougw@inlandnet.com

Officers

Susie Weis

Treasurer
PO Box 1427
Ronald, WA 98940
dougw@inlandnet.com
5096749097

Attachments

Name	Description
<hr/>	

Doug Weis - 2023

Candidate Information

Office:

SCHOOL DIRECTOR

Jurisdiction:

CLE ELUM-ROSLYN SD 404

Registration:

June 18, 2023

Address:

PO Box 1427
Ronald, WA 98940

Email:

dougw@inlandnet.com

Phone:

5096749097

Financial Information

No data available.

Status
<p>Primary Election Status: Lost in primary</p> <p>Campaign Status: Candidate declared</p>

Reports

[Candidate's Personal Financial Affairs disclosure](#)

[Candidate's surplus funds account](#)

Spending for and against this candidate

Independent Expenditures

Independent expenditures are made by third parties that are not part of a candidate's campaign.

No Independent Expenditures reported.

Campaign Finance Reports

See the reports filed by the candidate. Reports with a strikethrough were amended by another report.

Show entries

[Download 0 rows as CSV.](#)

Period	Report Number	Filed	Report	Form Type	Election Year
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No records found

There are no reports available for this campaign

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Kittitas County

August 1, 2023 Primary

Last updated on 08/15/2023 1:11 PM

Number of Precincts	16
Number of Registered Voters	7,565
Total Ballots Counted	2,607
Estimated Ballots Left to Count	
Next Ballot Count On	FINAL
Last Tabulated	08/15/2023 1:11 PM
Voter Turnout	34.46%
Certification Date	08/15/2023
Export Results	CSV · XML Precincts CSV

School

CLE ELUM-ROSLYN SCHOOL DISTRICT 404 At Large- AL#2		
Candidate	Vote	Vote %
Rob Iverson	819	31.59%
Doug Weis	632	24.37%
Monica Oertli Medalen	1,131	43.62%
WRITE-IN	11	0.42%
Total Votes	2,593	
Precinct Results »		

City/Town

CITY OF CLE ELUM Mayor		
Candidate	Vote	Vote %
Matthew Lundh	341	60.57%
Kerry Clark	140	24.87%
Ron Wayne	78	13.85%

WRITE-IN	4	0.71%
Total Votes	563	
Precinct Results »		

[Phone Numbers](#) | [Privacy Policy](#) | [Accessibility](#)
Washington Secretary of State · Elections Division
520 Union Ave SE
PO Box 40229, Olympia WA 98504-0229
(360) 902-4180

PDC Exhibit 3



**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.pdcca.wa.gov

August 6, 2024

Doug Weis
PO Box 1427
Ronald, WA 98940

Also delivered electronically to: dougw@inlandnet.com

Also mailed to: 640 Wadsworth Loop Ronald, WA 98940 and PO Box 171 Roslyn, WA 98941

Subject: Brief Enforcement Hearing Notice; PDC Case Number 151234

Dear Doug Weis:

On the date below, the Public Disclosure Commission (PDC) will hold a Brief Adjudicative Proceeding (Brief Enforcement Hearing) in accordance with RCW 42.17A.110 and RCW 42.17A.755 to determine if you violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures on required reports in 2023 for your candidacy as School Director of Cle Elum-Roslyn School District 404, as alleged in the complaint filed against you in PDC Case 151234.

Specifically, our records show that, to date, you have not filed a 21-day pre-Primary C-4 report, 7-day pre-Primary C-4 report, and post-Primary C-4 report, which were due July 12, 2023, July 25, 2023 and September 11, 2023 respectively. In addition, no C-3 reports have been filed, and are required if any monetary contributions were received during your campaign.

Under the Brief Enforcement Hearing rules, the Presiding Officer has the authority to assess a civil penalty in accordance with WAC 390-37-143, a penalty schedule adopted by the Commission (see enclosed copy).

Your attendance at the hearing is encouraged but not required.

HEARING INFORMATION

Date and time: **Thursday, September 12, 2024 at 1PM**
Place: Remotely from Olympia
Live Audio and Online Transmission
Presiding Officer: Allen Hayward, Chair, Public Disclosure Commission
Authority: RCW 42.17A and WAC 390

ATTENDING OR PARTICIPATING IN THE HEARING VIA MICROSOFT TEAMS

The Brief Enforcement Hearing will be audio and video recorded. The Presiding Officer and PDC Staff will attend in-person or remotely via Microsoft Teams videoconferencing platform.

- **PLEASE READ the entire instructions below *prior to the day of the hearing if you plan to attend or participate via MS Teams.***

Please note that you may be prompted to download the MS Teams app or use a supported browser (Microsoft Edge or Google Chrome) for best performance.

If you wish to attend or participate in the hearing remotely, please follow the instructions below and join the meeting on a computer or mobile app **promptly by 1PM on September 12, 2024.** Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave or stay in the meeting.

Please note that you must stay muted at all times except while your case is being heard.

Join on your computer or mobile app:

<https://tinyurl.com/22drhc6z>

If you are unable to use Teams or experience technical difficulties, please call the PDC's main number 1 (360) 753-1111 to obtain information regarding alternate participation by telephone.

If you choose to participate in the hearing remotely, please be aware that you may be waiting in the queue for a unknown period of time while cases are being heard and you may have a limited amount of time to speak. If a lengthier response time is needed, please consider submitting written participation materials prior to the hearing (see below).

INTERPRETER

If a party or witness to this proceeding speaks limited English or is hearing-impaired, and needs an interpreter, a qualified interpreter will be appointed at no cost to you. Please inform us at least five business days before the hearing or no later than **September 5, 2024** if you require an interpreter for this proceeding and/or translation of its written materials in a language other than English. Please contact us by email at pdc@pdc.wa.gov or call us at 1 (360) 753-1111 or 1 (877) 601-2828 to request an interpreter.

SUBMITTING WRITTEN MATERIALS

In advance of the Brief Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Presiding Officer, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by the PDC no later than **September 5, 2024.**

SUBMITTING THE REPORTS

You are strongly encouraged to complete and submit the required missing reports [online](#) prior to the day of the Brief Enforcement Hearing so they are *received* by the PDC no later than **September 5, 2024.** The reports must be submitted electronically and instructions are available

online. If you need help filing reports, please reach out to us *as soon as possible* so we can put you in touch with a Filer Assistance Specialist.

If you have any questions about the hearing process prior to the hearing date, please contact me by email at pdcc@pdc.wa.gov and be sure to reference your case number in the subject line of the email.

Sincerely,

Tabatha Blacksmith
Compliance Officer
(360) 753-1111



Enclosures

- Brief Enforcement Hearings FAQ
- PDC Penalty Schedule

BRIEF ENFORCEMENT HEARINGS – INFORMATION FOR FILERS

You have received a letter or email from the PDC scheduling a Brief Enforcement Hearing before a PDC Commissioner. Here are the answers to some Frequently Asked Questions about these brief hearings. This FAQ is informational only and should not be considered legal advice.

What is a Brief Enforcement Hearing?

The PDC is responsible for enforcing the State's campaign finance laws. We may schedule what is called a Brief Enforcement Hearing (also known as a "Brief Adjudicative Proceeding" under the Administrative Procedure Act) to address compliance with campaign finance reporting requirements when evidence shows the following types of alleged violations may have occurred:

- Failure to file or timely file required reports of financial affairs, campaign contributions and/or expenditures, independent expenditures, or funds spent on lobbying;
- Improper use of public facilities or resources in election campaigns when the value of public funds expended or facilities used was minimal; and
- Infractions of political advertising laws regarding sponsor identification or political party identification.

Brief Enforcement Hearings may be scheduled on other matters as well, if the basic facts are agreed to or are not being contested, and it is anticipated that the likely penalty imposed (if a violation is found) will be \$1,000 or less. The Commission has adopted a penalty schedule for Brief Enforcement Hearings which can be found in the Washington Administrative Code [WAC 390-37-143](#).

A Presiding Officer, who is a PDC Commissioner, will conduct the hearing. PDC Staff will present the case to the Presiding Officer, and you will have an opportunity to explain the circumstances related to the alleged violations. You may do this remotely online, by telephone, in writing (by email or letter) or in person.

Who are the parties involved?

The PDC Staff initiates and investigates possible violations, and brings cases forward to the Commission or its Presiding Officer. The person who is alleged to be out of compliance with the law is referred to as the "Respondent."

What do I do to prepare for the hearing?

The brief hearings are informal in nature. You are not required to have an attorney for this hearing. Hearings take place virtually and/or in the PDC meeting room where Commission meetings are held. You need to let the staff know at least five business days before the hearing whether you will be attending or participating remotely online, by phone, in-person or prefer not to attend.

If you are having other people (witnesses) testify on your behalf, they must be available at the hearing, and staff needs to be informed of the number of witnesses and time needed for their testimony when you notify the staff of your participation. The scheduled hearing starting time is the start time for several matters that will be heard by the Presiding Officer, and your case may not be the first one heard. So you will need to remain available to participate until your case is called.

Waiving your right to participate. If you have submitted nothing in writing prior to the hearing, have made no other arrangements, and you do not appear online, by phone, in-person, or through your legal counsel at the hearing, it will be presumed that you have decided to waive your right to participate at the hearing.

What happens at the hearing?

The Presiding Officer will introduce the participants and explain the procedure for the hearing. The hearing will be audio-taped.

The Presiding Officer will swear-in PDC Staff for them to present information regarding the alleged violation of law. You will then have an opportunity to testify, which is your opportunity to present information. All testimony by staff, Respondents, and witnesses is given under oath but, if you attend in-person, you are seated at a regular meeting table with a microphone, not in a courtroom. The Presiding Officer may ask you some questions about the information you, PDC Staff, or witnesses have presented. If you have decided to participate in writing instead of online, by phone or in-person, your written information will be considered by the Presiding Officer as part of the hearing materials.

If at any time the Presiding Officer believes the alleged violations are serious enough to merit penalties greater than \$1,000, the Presiding Officer will adjourn the hearing and direct that the matter be scheduled for a hearing before the full Commission at a later time.

How is the decision made?

After considering all the information presented at the hearing, the Presiding Officer will make a decision about the allegation(s) and any appropriate penalty amount. The decision is typically announced orally at the hearing.

The Presiding Officer will use the penalty schedule referred to above that has been adopted by the Commission in rule to determine the appropriate penalty for certain types of violations, taking into account aggravating and mitigating factors. The penalty schedule is below.

What happens after my hearing?

A written decision, called an Initial Order, laying out the Presiding Officer's ruling, including the findings and the penalty, will be sent to you. The PDC tries to get orders issued within 10 days, if possible, and not later than 30 days. If a monetary penalty is imposed in the Initial Order, the penalty must be paid to the **Washington State Treasurer**, and mailed to the address listed in the Order cover letter within the time frame stated in the Order.

Along with your Initial Order, you will also receive information about your appeal rights, including how to request review or reconsideration by the full Commission if you disagree with the Initial Order. Follow these procedures carefully if you wish to appeal. If there is no appeal before the PDC, the Initial Order becomes a Final Order, and further appeals must be made in Superior Court.

What are the rules that apply to the procedures of my hearing?

The PDC's laws and rules are available on the PDC's website at www.pdc.wa.gov. The laws are in the Revised Code of Washington ([RCW](#)) [Chapter 42.17A](#). The rules are in the Washington Administrative Code ([WAC](#)) [Title 390](#). Brief Adjudicative Proceedings are described at [WAC 390-37-140](#) through [390-37-150](#) and in the Administrative Procedure Act (APA) at [RCW 34.05.482-494](#).

Penalty Schedule [[WAC 390-37-143](#)]:

The Presiding Officer may assess a penalty up to one thousand dollars upon finding a violation of chapter [42.17A](#) RCW or Title 390 WAC.

(1) Base penalty amounts:

Violation	1st Occasion	2nd Occasion	3rd Occasion
Failure to timely file an accurate and complete statement of financial affairs (F-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Candidate's failure to timely file an accurate and complete registration statement (C-1)/statement of financial affairs (F-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150 per report	\$150 - \$300 per report	\$300 - \$600 per report up to \$1,000
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150 per report	\$300 per report	\$600 per report up to \$1,000
Failed to file report by date of enforcement hearing.	\$250 per report	\$500 per report	consideration by full commission
Failure to timely file an accurate and complete lobbyist monthly expense report (L-2):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Failure to timely file an accurate and complete lobbyist employer report (L-3):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,00

Failure to timely file accurate and complete disclosure reports:			
Political committee registration (C-1pc).	\$150	\$300	\$600
Statement of contributions deposit (C-3).	\$150	\$300	\$600
Summary of total contributions and expenditures (C-4).	\$150	\$300	\$600
Independent expenditures and electioneering communications (C-6).	\$150	\$300	\$600
Last minute contribution report (LMC).	\$150	\$300	\$600
Out-of-state committee report (C-5).	\$150	\$300	\$600
Annual report of major contributors (C-7).	\$150	\$300	\$600
Failure to timely file accurate and complete reports disclosing lobbying activities:			
Lobbyist registration (L-1).	\$150	\$300	\$600
Public agency lobbying report (L-5).	\$150	\$300	\$600
Grass roots lobbying report (L-6).	\$150	\$300	\$600
Failure to file electronically.	\$350	\$650	\$1,000
Exceeding contribution limits.	\$150	\$300	\$600
Exceeding mini reporting threshold.	\$150	\$300	\$600
Failure to comply with political advertising sponsor identification requirements.	\$150	\$300	\$600
Failure to include required candidate's party preference in political advertising.	\$150	\$300	\$600
Failure to comply with other political advertising requirements, RCW 42.17A.330 through 42.17A.345 .	\$150	\$300	\$600
Use of public facilities to assist a campaign for election or promote a ballot measure.	\$150	\$300	\$600
Treasurer's failure to timely file an accurate and complete annual treasurer's report (T-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000

"Occasion" means established violation. Only violations in the last five years will be considered for the purpose of determining second and third occasions.

(2) In determining the appropriate penalty, the presiding officer may consider the nature of the violation and aggravating and mitigating factors, including:

- (a) Whether the respondent is a first-time filer;
- (b) The respondent's compliance history for the last five years, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;
- (c) The respondent's unpaid penalties from a previous enforcement action;
- (d) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period, or otherwise had a significant or material impact on the public;
- (e) The amount of financial activity by the respondent during the statement period or election cycle;
- (f) Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;
- (g) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention;
- (h) Good faith efforts to comply, including consultation with PDC staff prior to initiation of enforcement action and cooperation with PDC staff during enforcement action, and a demonstrated wish to acknowledge and take responsibility for the violation;
- (i) Personal emergency or illness of the respondent or member of his or her immediate family;
- (j) Other emergencies such as fire, flood, or utility failure preventing filing;
- (k) Sophistication of respondent or the financing, staffing, or size of the respondent's campaign or organization; and
- (l) PDC staff, third-party vendor, or equipment error, including technical problems at the agency preventing or delaying electronic filing.

(3) The presiding officer has authority to suspend all or a portion of an assessed penalty under the conditions to be determined by that officer including, but not limited to, payment of the nonsuspended portion of the penalty within five business days of the date of the entry of the order in that case.

(4) If, on the third occasion, a respondent has outstanding penalties or judgments, the matter will be directed to the full commission for consideration.

(5) The presiding officer may direct a matter to the full commission if the officer believes one thousand dollars would be an insufficient penalty or the matter warrants consideration by the full commission. Cases will automatically be scheduled before the full commission for an enforcement action when the respondent:

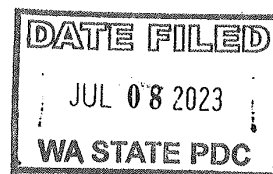
- (a) Was found in violation during a previous reporting period;
- (b) The violation remains in effect following any appeals; and

(c) The person has not filed the disclosure forms that were the subject of the prior violation at the time the current hearing notice is being sent.

[Statutory Authority: RCW [42.17A.110](#)(1) and 2018 c 304. WSR 18-24-074, § 390-37-143, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW [42.17A.110](#)(1) and [42.17A.570](#). WSR 18-10-088, § 390-37-143, filed 5/1/18, effective 6/1/18. Statutory Authority: RCW [42.17A.110](#). WSR 17-03-004, § 390-37-143, filed 1/4/17, effective 2/4/17.]

PDC Exhibit 4

Public Disclosure Commission Statement of Understanding
Doug Weis: PDC Case 138735



I hereby acknowledge that I, Douglas Weis, did not
(Printed Name of Respondent)

timely file the required *Personal Financial Affairs Statement* (F-1 report) with the Public Disclosure Commission (PDC) as required for a candidate seeking elected office in 2023. The F-1 report was due to be filed within two weeks of my becoming a candidate in the 2023 election or no later than June 2, 2023, thereby violating RCW 42.17A.700.

I want to avoid the time and expense resulting from a Brief Adjudicative Hearing (Brief Enforcement Hearing) before the Presiding Officer. Therefore, I am filing the F-1 report, completing the *Statement of Understanding*, and enclosing a check or money order in the amount of \$100 for the late-filed report, in lieu of a July 20, 2023 Brief Enforcement Hearing being held.

I understand that this will resolve all issues with the PDC regarding my failure to timely file the F-1 report, provided that my missing report is completed online, and a check or money order for \$100 and this signed *Statement of Understanding* are mailed to the PDC and postmarked on or before July 10, 2023.

I further understand that Commission staff will not be scheduling a Brief Enforcement Hearing before the Presiding Officer regarding my obligation to timely file the F-1 report that was due within two weeks of becoming a candidate.

A handwritten signature in dark ink, appearing to read "Douglas Weis", written over a horizontal line.

Signature of Respondent/Candidate

7-7-23

Date Signed

Be sure to certify and submit your F-1 report online, make your check or money order payable to "Washington State Treasurer" and mail this *Statement of Understanding* and your \$100 payment to the following address:

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