

STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission Statement of Understanding
Electrical Workers 46 PAC
PDC Case 153421

I, Charlotte Gitchel, in my capacity as Manager of the Electrical Workers 46 PAC (the PAC), hereby acknowledge that, during election years 2019, 2020, 2021, 2022 and 2023 the PAC violated RCW 42.17A.235 and .240 by failing to timely and accurately report expenditures and contributions on the Cash Receipts, Monetary Contributions (C-3) and Receipts & Expenditure Summary (C-4) reports.

The facts are as follows:

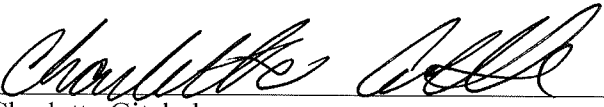
- Since 2017, the PAC has operated as a continuing committee registered with the PDC under the Full Reporting option. The PAC accepted contributions from members, but did not participate in elections between 2018 through 2022 due to reduced staff capacity and COVID. Up until 2017, as well as during 2023, the PAC accepted contributions from members and took part in elections by making expenditures in the form of contributions to other candidate and political action committees.
- The PAC filed the following amended reports on May 9, 2024, for calendar year 2023. These reports, which were filed between five and 11 months late, totaled \$32,150 in expenditures and \$34,809.50 in receipts:
 - C-4 #110213848, which amended report #110145452 to show expenditures not previously reported for a monetary contribution to the campaign Elect Denise Yun, paid on May 26, 2023, for \$950.
 - C-4 #110213849, which amended report #110149882 to show previously undisclosed receipts received totaling \$3,337.50 deposited on June 9, 2023, and expenditures totaling \$3,900. The expenditures were made as monetary contributions on June 8, 2023, to the following campaigns: \$300 for Neighbors for Nilu; \$2,000 for Sarah for King County; and \$1,200 for Re-Elect Ed Prince. Additionally, the amended report included the following expenditure from June 15, 2023: \$400 for People for Teresa.
 - C-4 #110213850, which amended report #110158028 to show receipts totaling \$402, deposited on July 17, 2023, and two previously undisclosed expenditures made as two separate \$3,000 contributions to Voices United PAC, on July 25, 2023.
 - C-4 #110213852, which amended report #110173820 to show a previously undisclosed expenditure in the form of a monetary contribution to Bob Ferguson for Governor, on September 27, for \$3,300.

- C-4 #110213853, which amended report #110176146 to show receipts totaling \$30,437.00, deposited October 12, 2023, and previously undisclosed expenditures made as monetary contributions on October 23, 2023, to the campaigns Elect Kate4Tukwila Committee, for \$1,200, and Elect Greg Baruso, for \$1,200.
 - C-4 #110213854, which amended report #110187245 to show receipts totaling \$633, deposited November 27, 2023, and \$15,600 in expenditures made in the form of monetary contributions to the following campaigns:
 - \$2,400 to People for Rebecca Saldana and \$2,400 to Elect Kristine Reeves on November 18, 2023;
 - \$2,400 to Elect Debra Entenman, \$2,400 to Hackney for the 11th, \$2,400 to Friends of Tana Senn, and \$2,400 to Elect Jamila Taylor all on November 21, 2023.
 - The campaign of Friends of Julia Reed received \$1,200 on November 29, 2023.
 - The PDC acknowledges the contributions received by the PAC were reported timely on the applicable C-3 reports.
- During 2023, the receipt and expenditure information were timely data entered into the Online Reporting of Campaign Activity (ORCA) system, but the PAC did not submit the data to amend earlier reports. This omission deprived the public of critical information prior to elections in 2023.
 - The PAC, upon realizing the reporting issues in the 2023 reports, conducted an audit of prior years' reports and realized there were many missing reports for earlier campaigns. The PAC was very responsive in amending earlier-filed reports and submitting reports for periods that had not been reported timely. Reports submitted by the PAC for calendar years 2017 and 2018, and filed late, are beyond the scope of the investigation due to the statute of limitations being exceeded but the correction of these reports, in August 2024, was necessary to ensure the reporting was accurate moving forward. In calendar years 2019, 2020, 2021, and 2022 the PAC did not file any C-3 and C-4 reports reflecting contributions and operational expenditures. In the years 2019 through 2022 the contributions and the expenditures combined never exceeded \$3000 each year. The PAC filed reports for the years of 2019 through 2022 on August 5, 2024.

Electrical Workers 46 PAC would like to avoid the time and expense of a Brief Adjudicative Proceeding (Brief Enforcement Hearing). Therefore, in lieu of a hearing, the PAC acknowledges that it violated Washington state law as described above and agrees to enter this Statement of Understanding (SOU) to resolve the above matter with the PDC.

In accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143, the PAC agrees to pay a total civil penalty of \$450 for acknowledged violations of RCW 42.17A.235 and .240 for failing to timely and accurately report expenditures and contributions, in calendar years 2019, 2020, 2021, 2022 and 2023, on the Cash Receipts, Monetary Contributions (C-3) and Receipts & Expenditure Summary (C-4) reports. The penalty breaks down as follows: \$300 for expenditures made by the PAC as contributions to 2023 campaigns that went unreported until May 2024, and \$150 for late filed reports for the period of 2019, 2020, 2021, and 2022.

The PAC understands that, by signing this SOU, it acknowledges the violations of Chapter 42.17A RCW and Title 390 WAC set forth above and waives its right to a hearing in this matter. The PAC further understands that signing this SOU and returning it to the PDC with a payment for the \$450 civil penalty will resolve PDC Case 153421.


Charlotte Gitchel
Manager

9/16/24
Date Signed

The signed Statement of Understanding (SOU) and \$450 penalty payment is due by **September 30, 2024**. See the options below for how to continue with either online, by mail, or in-person processing.

Electronic Payment Option

Please be aware, processing fees may apply. To start the process for making an online payment, do the following:

Email an electronic copy of the signed SOU to the Compliance Officer assigned to your case.

- A photo or scan of the signed SOU is acceptable. Do make sure that all parts of the SOU are within focus and readable.
- To email the signed SOU to your Compliance Officer, reply directly to the last email you had with the Compliance Officer and attach the document.
- The Compliance Officer must receive the signed SOU no later than **Wednesday, September 25, 2024**.
 - A signed SOU is required for the terms of the agreement to be fulfilled.
 - If we do not receive the SOU, your case will be scheduled for the next available Brief Adjudicative Proceeding (BAP). If this occurs, the Commission's Presiding Officer will hear the case.
- If you send the SOU and payment electronically, you DO NOT need to mail a hard copy of the SOU to your Compliance Officer

Once the SOU is received, PDC staff will email a payment link and further instructions about how to make a payment.

- You must send the payment, via the link, no later than **September 30, 2024**.

Mail or In-Person Payment Option

To pay by check or money order, make the payment payable to "Washington State Treasurer," write your PDC Case Number in the Memo field, and mail or deliver the payment **and your signed SOU** to one of the addresses listed below, no later than **September 30, 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