



State of Washington  
PUBLIC DISCLOSURE COMMISSION

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**Public Disclosure Commission: Statement of Understanding**

**WA Association of Nurse Anesthetist's: PDC Case 153899**

I Hanna Jones, as a Representative of the Washington Association of Nurse Anesthetists (WANA), a lobbyist employer registered with the PDC for the 2023-2024 Legislative Biennium, hereby acknowledge that WANA violated the following:

1. **RCW 42.17A.640** for failing to timely and accurately file a Grassroots Lobbying Report (L-6 report) disclosing grassroots lobbying advertisements undertaken during the 2024 Legislative session.
2. **RCW 42.17A.640(5)** by failing to include any sponsor identification on grassroots lobbying advertisements costing more than \$1,0000 that included text and email communications sponsored during the 2024 Legislative session.

**Factual Background**

- WANA is a Lobbyist Employer who has hired contract lobbyists and filed Annual Employer's Lobbying Expenses reports (L-3 reports) dating back to 2006.
- For the 2023-2024 Biennium, WANA as a Lobbyist Employer contracted with Gordon Thomas Honeywell, a law firm which is registered with the PDC as a contract lobbying firm, to file the monthly L-2 reports for multiple clients under the firm name.
- The initial 2024 February and March L-2 reports were timely filed by Gordon Thomas Honeywell, disclosing that WANA paid the firm \$5,000 to lobby on their behalf for each month.
- After WANA became aware of the complaint and allegations, WANA contacted Gordon Thomas Honeywell and requested they file amended L-2 reports for the months of February and March, to disclose grassroots lobbying advertisements that were undertaken by WANA but were not reported.

- On June 3, 2024, Gordon Thomas Honeywell filed an amended 2024 February L-2 report disclosing \$16,440.30 in new expenditure made to Cerillion N4 Partners on February 14, 2024, for “Grass Roots Lobbying Text Messages (51,102)” in opposition to SB 5184. The amended information was disclosed 80 days late, and after the 2024 Legislature had adjourned.
- Also on June 3, 2024, Gordon Thomas Honeywell filed an amended March L-2 report disclosing \$6,000 in new expenditures made to Cerillion N4 Partners on March 21, 2024, for “Grass Roots Lobbying Text Messages (23,000) and Emails (464)” in opposition to SB 5184. The amended information was disclosed 49 days late, and after the 2024 Legislature had adjourned.
- As a sponsor of grassroots lobbying advertisements costing more than \$1,000, WANA was required to include a complete sponsor identification on the grass roots lobbying advertisements in opposition to SB 5184 during the 2024 Legislative session.

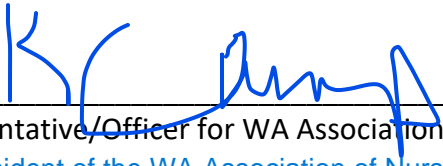
WANA would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing). Therefore, in lieu of a hearing, WANA acknowledges it committed the three violations of Washington State law as described above and agrees to enter into this Statement of Understanding to resolve this case with the Public Disclosure Commission (PDC).

Further, in accordance with the Penalty Schedule set forth in WAC 390-37-143, WANA agrees to pay a \$300 civil penalty for violating RCW 42.17A.640 as follows:

- A \$150 penalty as a sponsor for failing to timely disclose grass roots lobbying advertisements as detailed above.
- A \$150 penalty for the failure to include any of the required sponsor identification information on grassroot lobbying advertisements sponsored during the 2024 Legislative Session.

By signing this Statement of Understanding, WANA acknowledges that it violated RCW 42.17A.640 and .640(5) and waives its rights to a hearing in this matter.

WANA further understands that by signing this Statement of Understanding and paying the \$300 civil penalty, PDC Case 153899 is resolved.



07/31/2024

Representative/Officer for WA Association of Nurse Anesthetists

Date Signed

President of the WA Association of Nurse Anesthetists

**Note:** For Online payment options and information, please see below. To mail a check or money order, make it payable to the "Washington State Treasurer" and be sure to include the PDC Case Number 149619 in the memorandum field.

**For Regular Mail:**

Public Disclosure Commission  
PO Box 40908  
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**For Overnight Mail or In-Person Delivery:**

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**Online Payment Option:**

To make an online payment email [payments@pdc.wa.gov](mailto:payments@pdc.wa.gov)

A payment link will be sent to you, in which you will need to provide the following information: (1) Case Number; and (2) Respondent Name. Processing fees may apply.



**Public Disclosure Commission**  
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