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**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

In re the Matter of Enforcement Action
Against:

SHAUN SCOTT AND THE FIGHTING 43rd,

Respondent.

PDC CASE NO. 155771

FINAL ORDER

I. INTRODUCTION

This matter was heard by the Washington State Public Disclosure Commission (PDC, Commission) on July 24, 2025, by in-person, telephonic, and online streaming access. The hearing was held pursuant to Chapter 34.05 RCW, Chapter 42.17A RCW, and Chapter 390-37 WAC.

Commissioners present in-person were J. Robert Leach, Commission Chair (presiding); Douglass North, Commission Vice-Chair; and Commissioners Nancy Isserlis and James Oswald. Also present online were Assistant Attorney General William Schwarz representing the Commission; and Assistant Attorney General Susie Giles-Klein representing PDC staff. Tanya Mercier, Compliance Officer for PDC Staff, appeared in person and Shaun Scott appeared

1 online for the Respondent. The proceeding was open to the public and recorded.

2 The hearing concerned allegations that the Respondent violated RCW 42.17A.235 and
3 .240, and WAC 390-16-042, WAC 390-16-205, and WAC 390-16-043 by reporting incomplete
4 or inaccurate information on pre-primary Cash Receipts, Monetary Contribution (C-3) and
5 receipts and Expenditure Summary (C-4) reports and failing to timely file mandatory 21-day, 7-
6 day, and post-primary C-4 reports; failing to timely file mandatory 21-day and 7-day pre-general
7 reports; failing to timely and accurately report debt and receipt of contributions; and by failing
8 to provide campaign books of account for inspection. It was further alleged that during election
9 year 2024, the Committee violated RCW 42.17A.320 and WAC 390-18-010 by failing to include
10 complete sponsor identification on political advertisements; failing to conform to formatting
11 requirements; and using an assumed name for the sponsor identification. As to Mr. Scott
12 personally, he is alleged to have violated RCW 42.17A.445 and WAC 390-16-238 by expending
13 campaign funds for impermissible personal use.

14
15 The Commissioners had before them the following materials:

- 16 • Amended Notice of Administrative charges, PDC Case No. 155771, dated June
17 27, 2025, and signed by Executive Director Peter Lavallee;
- 18 • Amended Report of Investigation for Case 155771, prepared by Tanya Mercier,
19 Compliance Officer, dated June 16, 2025, which included:
 - 20 ○ Exhibit 1: Complaints to the PDC from Conner Edwards, Katie Martin,
21 and Carl Larson including notification by PDC Staff to The Fighting 43rd
22 Committee, and subsequent communications between PDC Staff and the
23 Respondent regarding the allegations;
 - 24 ○ Exhibit 2: Transcript for video recording of December 6, 2024, interview
25 by PDC Staff with Shaun Scott;
 - 26 ○ Exhibit 3: 6x11 POLAD Mailer, delivered July 14, 2024, and

1 corresponding to Capitol City Press Invoice #158789;

- 2 ○ Exhibit 4: First “Chopp Letter,” delivered June 17, 2024;
- 3 ○ Exhibit 5: Invoice #158902 from Capitol City Press;
- 4 ○ Exhibit 6: Second “Chopp Letter” delivered October 14, 2024;
- 5 ○ Exhibit 7: Confirmation from Jason Bennett about haircut expenditures;
- 6 ○ Exhibit 8: February 26, 2025, Communication from Jason Bennett and
- 7 record of reports file by period;
- 8 ○ Exhibit 9: Listing of 2024 Cash Receipts, Monetary Contributions C-3
- 9 reports, and Receipts and Expenditure Summary C-4 reports submitted;
- 10 ○ Exhibit 10: Summary of 2024 campaign contributions, expenditures, and
- 11 debts;
- 12 ○ Exhibit 11: March 14, 2025, communications from Jason Bennett.

- 13
- 14 • Proposed Stipulation as to Facts and Violations, submitted by the parties and signed on July
- 15 21, 2025, by Shaun Scott for the Fighting 43rd, and on July 21, 2025, by Peter Lavallee,
- 16 Executive Director for the PDC.
- 17

18 II. STIPULATION

19 The parties jointly submitted a signed Stipulation as to Facts and Violations,
20 (Stipulation). Ms. Giles-Klein presented the Stipulation, reviewed the aggravating and
21 mitigating factors, summarized the facts and asked the Commission to accept the Stipulation.
22 Mr. Scott was available for questions and confirmed the information provided by Ms. Giles-
23 Klein. The Respondent took responsibility and asked the Commission to accept the Stipulation.
24 The Commission voted 4-0 to accept the Stipulation as submitted.

25 III. FINDINGS OF FACT

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1 pre-general reports; (3) failing to timely and accurately report debt and receipt of contributions;
2 and (4) failing to provide campaign books of account inspection.

3 The Commission further accepts the parties' stipulation to violations of RCW 42.17A.320 and
4 WAC 390-18-010 by: (1) failing to include complete sponsor identification on political
5 advertisements; (2) failing to conform to formatting requirements; and (3) using an assumed
6 name for the sponsor identification on political advertisements. Additionally, the Commission
7 accepts Mr. Scott's stipulation to violation of RCW 42.17A.445 and WAC 390-16-238 by
8 expending campaign funds for impermissible personal use.

9
10 3. The mitigating and aggravating factors in the Stipulation on pages 9-11 (Sections 28-
11 34) are incorporated by reference into this order. In addition, the Commission acknowledges
12 the mitigating factor of the difficulty of a candidate running his own campaign and
13 simultaneously managing financial reporting after his Treasurer leaves unexpectedly.

14 15 **V. ORDER**

16 Based upon the stipulated Findings of Fact and the Commission's Conclusions of Law,
17 the Commission accepts the agreed Stipulation of the parties as to Facts and Violations. After
18 review of the mitigating and aggravating factors and consideration of the arguments and exhibits
19 presented at hearing, the Commission assesses an aggregate civil penalty on Respondent The
20 Fighting 43rd of \$10,000 with \$5,000 suspended on the conditions in Section V(1) of this order.
21 In addition, the Commission assesses a civil penalty on Respondent Shaun Scott of \$1,000 with
22 \$500 suspended on the conditions in Section V(2) of this order.

- 23
24 1. Respondent The Fighting 43rd Committee shall pay an aggregate civil penalty of
25 \$10,000 for all violations, except those separately assessed in Section V(2) of this
26 order, with \$5,000 suspended on the following conditions:

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- a. The non-suspended portion of the penalty (\$5,000) is paid by the Respondent within 90 days of the date of the Final Order.
- b. The Respondent remains in full compliance with all PDC reporting requirements and is not found to have committed any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this Final Order. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction.
- c. If the Respondent fails to make timely payment of the non-suspended portion of the penalty, the total civil penalty of \$10,000 shall immediately become due and the matter may be sent to collection or brought to Superior Court as allowed by law without further action by the Commission.

2. Respondent Shaun Scott shall pay a \$1,000 civil penalty with \$500 suspended on the following conditions:

- a. The non-suspended portion of the penalty (\$500) is paid by the Respondent within 90 days of the date of the Final Order.
- b. The Respondent separately reimburses his campaign for his impermissible use of campaign funds for personal expenses totaling \$756 within 90 days of the Final Order.

1 c. The Respondent remains in full compliance with all PDC reporting
2 requirements and is not found to have committed any further violations
3 of Chapter 42.17A RCW or Title 390 WAC within four years of the date
4 of this Final Order. The suspended penalty shall not be assessed based
5 solely upon any remediable violation, minor violation, or error classified
6 by the Commission as appropriate to address by a technical correction.
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8 d. If the Respondent fails to make timely payment of the non-suspended
9 portion of the penalty, the total civil penalty of \$1,000 shall immediately
10 become due and the matter may be sent to collection or brought to
11 Superior Court as allowed by law without further action by the
12 Commission.
13

14 So ORDERED this __4th__ day of August, 2025.

15 WASHINGTON STATE PUBLIC
16 DISCLOSURE COMMISSION

17 FOR THE COMMISSION:

18 J. Robert Leach

J. Robert Leach (Aug 4, 2025 09:00:14 PDT)

19 J. Robert Leach,
20 Chair, Public Disclosure Commission

21 *Copy of this Order mailed and/or emailed to:*

22 Respondent Shaun Scott and the Fighting 43rd Committee,
23 shaun@betterwashington.org
24 organizewithshaun@gmail.com

25 Tanya Mercier, PDC Compliance Officer, Tanya.mercier@pdc.wa.gov

26 Susie Giles-Klein, Assistant Attorney General, Counsel for PDC Staff, Susie.giles-klein@atg.wa.gov.

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3 I, Tanya Mercier, certify that I mailed and/or emailed a copy of this order to the
4 Respondent/ Applicant at his/her respective address postage pre-paid on the date stated
5 herein.

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8 Tanya Mercier Aug 4, 2025

9
10 Tanya Mercier (Aug 4, 2025 09:21:23 PDT)

11 Signed

12 Date

13 **NOTICE: RECONSIDERATION**

14 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a Petition for
15 Reconsideration with the PDC within ten (10) days from the date this Final Order is served upon
16 you. Any Request for reconsideration must state the specific grounds for the relief requested.
17 Petitions must be electronically mailed to the Washington State Public Disclosure Commission,
18 711 Capitol Way, Room 206, Box 40908, Olympia WA 98504-0908, pdc@pdc.wa.gov.

19 **NOTICE: PETITION FOR JUDICIAL REVIEW**

20 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for
21 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final
22 Order must be filed with the court and also served upon both the Commission and the Office of
23 the Attorney general within thirty (30) days after the date this Final Order is served upon you.
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