

Elinor Engle

reported via email *Wed, 12 Feb 2025 at 3:58 PM*

To: "pdc@pdc.wa.gov" pdc@pdc.wa.gov
Cc: cole@workerlaw.com , franco@workerlaw.com

External Email

Good afternoon,

Please find IAFF Local 1747's response to the first set of allegations raised in the above-referenced PDC complaint. We will be following up with a response to the additional issue concerning attorneys fees reporting in the next few days.

Thank you,
Elinor



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Azor Cole
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*Original via email to:
pdc@pdc.wa.gov*

February 12, 2025

Public Disclosure Commission
711 Capitol Way S #206
Olympia, WA 98504

Re: Complaint No. 161183
BIL File No. 4521-003

Dear PDC Staff,

This letter constitutes IAFF Local 1747's response to the first set of allegations raised from the complaint in PDC Case No. 161183. The complaint alleges violations of RCW 42.17A.235 and .240 for failure to timely and accurately disclose contributions and required expenditure details on reports. In the PDC's December 2, 2024, email to our client, you advised that because Case No. 159748 addressed the late reporting issues, this response should focus solely on the name and address requirements of RCW 42.17A.240.

As an initial matter, over 90 percent of the individual contributors reported in IAFF Local 1747's C3 in question (Report No. 110242452) contributed less than the \$100 reporting threshold required. RCW 42.17A.240(2)(c) (Threshold for reporting contributor identity raised from >\$25 to >\$100 April 1, 2023).¹ Out of 277 individuals listed, only 23 contributed more than \$100 in the aggregate, and of those 23, nobody contributed more than \$175.

Multiple WAC 390-37-061 factors support resolving this matter through a dismissal, written reminder, or an alternative response.

1. The noncompliance resulted from a good-faith error, omission, or misunderstanding. It was not an intentional effort to conceal, deceive, mislead, or violate the law.

IAFF Local 1747 in no way intentionally violated any law. This issue arises from IAFF Local 1747's misunderstanding around the specificity required from RCW 42.17A.240(2).

2. The impact of the noncompliance on the public was minimal.

¹ [New contribution limits and reporting thresholds take effect April 1, 2023 | Washington State Public Disclosure Commission \(PDC\).](#)

Any impact of the noncompliance from IAFF Local 1747 listing first initials instead of first names and a PO BOX as a contributor's address on the public was minimal. And even in the scenario where a member of the public felt meaningfully deprived of knowing an individual's full address and first name when looking at C3 No. 110242452, that same member of the public would be, in many ways, better informed than legally required on account of IAFF Local 1747 reporting over 200 contributions of \$100 or less in the aggregate that it was not required to.

3. IAFF Local 1747 has taken remedial measures.

IAFF Local 1747 sought clarification from the PDC on how it should proceed with remedial measures. Upon receiving an answer, IAFF Local 1747 amended its C3 Report No. 110242452 to include full names and addresses for each individual who contributed over \$100 in the aggregate, as required by RCW 42.17A.240(2).

4. There is no evidence that any person, including an entity or organization, benefited politically or economically from the noncompliance.

IAFF Local 1747 in no way benefited, politically or economically, from listing each address as its PO Box and using an individual's first initial in place of their first name. And no evidence suggests any other person or entity benefited either.

In light of these considerations, IAFF Local 1747 requests that the PDC resolve this matter through a dismissal, written reminder, or an alternative response rather than a full investigation and adjudicative hearing.

Please contact me with any questions or concerns at (206) 257-6009.

Sincerely,



Azor Cole

Counsel for IAFF Local 1747