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February 19, 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 second allegation raised in PDC Case No. 161183. The complaint alleges violations of RCW 42.17A.235 and .240 for failure to file pre- and post-general election C-4 reports on the adjusted 7- and 21-day schedule.

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. Upon receiving the resolution letter for PDC Case 159748 on October 11, 2024, concerning the adjusted 7- and 21-day reporting dates around the primary election, IAFF Local 1747 mistakenly, but understandably, believed it could return to its normal practice of filing C-4 reports on the standard timeline. The resolution letter reads, in relevant part, "PDC staff is reminding you to submit C-4 expenditure reports by the expedited deadlines in RCW 42.17A.235 when you have engaged in activity supporting candidates on the primary ballot."¹ The letter does not flag the requirement to do the same for the upcoming general election. So, while the contents of this letter could have prompted IAFF Local 1747 to find RCW 42.17A.235 on its own and identify that the requirements apply to the general election as well, IAFF Local 1747's belief that this matter was behind

¹<https://pdcc-case-tracking.s3.us-gov-west-1.amazonaws.com/7331/159748%20Kent%20Firefighters%20IAFF%20Local%201747%20PAC%20Sponsored%20by%20Kent%20Firefighters%20Local%201747%20Resolution%20Letter.pdf>

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them was made in good faith by the volunteer who does its reporting. It now has a fuller understanding of its obligations and is committed to fully reporting going forward.

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

Any impact of the noncompliance from IAFF Local 1747 reporting its C-4 reports on the normal monthly schedule was minimal. All data was disclosed to the public, albeit on the standard timeline (i.e. reported on the 10th of the month). In some cases, this resulted in information being disclosed to the public even earlier than it would have been had the 7- and 21-day adjusted timeline been followed.

3. 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 filing its C-4 reports on the normal calendar rather than the adjusted 7- and 21-day calendar. 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 with a written reminder. The PDC has frequently resolved similar cases through an alternate response to a formal investigation and enforcement under RCW 41.17A.235 and .240 with a dismissal with a written reminder. *See, e.g.*, PDC Case No. 160723 (where PAC failed to follow 21- and 7-pre-election filing deadlines and case was dismissed with reminder); PDC Case No. 160719 (same); PDC Case No. 160311 (same).

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

Sincerely,



Azor Cole

Counsel for IAFF Local 1747