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***Original via email to:  
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Februray 13, 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 International Association of Fire Fighters Local 1747's (IAFF Local 1747) response to the second 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 attorneys fees expenditures.

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

1. If there was noncompliance, it 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 the law. The complaint points out that a previous response to a different PDC complaint was written by former Barnard Iglitzin & Lavitt attorney Mike White and not reported as a contribution on any C-4 report. Notably, Mr. White no longer worked at Barnard Iglitzin & Lavitt and was not practicing as an attorney at the time he provided services to IAFF Local 1747. Mr. White wrote this response free of charge to IAFF Local 1747 and in his personal capacity. IAFF Local 1747 reasonably believed that the legal requirement to report the estimated value of a non-practicing attorney is not something that must be reported as an in-kind contribution.<sup>1</sup> And in such case, there was no failure to report. And if this is not the case, for the reasons discussed below, a dismissal, written reminder, or an alternative response is appropriate.

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

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<sup>1</sup> [Receipts That Are Not Contributions | Washington State Public Disclosure Commission \(PDC\)](#)

Any impact on the public from IAFF Local 1747 not reporting the fair market value of Mr. White's volunteer legal services in responding to a PDC complaint is minimal. There is no suggestion that the PAC's expenditures in any campaign were not reported – the only alleged failure to report involves internal transactions with the PAC not pertaining to any election.

In apparent recognition that legal expenses associated with PDC compliance and case handling are of limited public interest, the PDC has declined to find a material violation of the Fair Campaign Practices Act solely based on a committee's failure to timely report such costs.<sup>2</sup> The PDC has also found that failure to report a four-figure outstanding debt associated with unpaid legal services was a "minor or technical" reporting discrepancy that did not rise to the level of an enforcement action, where the committee at issue handled over a million dollars in contributions and expenditures.<sup>3</sup> And the PDC dismissed with a warning a complaint stemming in part from a committee's failure to report \$228,641 of in-kind legal expenses over the course of an entire year.<sup>4</sup>

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 failing to report the fair market value of Mr. White's couple of hours of donated legal services in response to a PDC complaint. 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*

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<sup>2</sup> See PDC Case No. 37430 (finding no evidence of material violation warranting further investigation where committee reported the in-kind contribution of legal services associated with its payment of a PDC penalty thirty-five days late).

<sup>3</sup> See PDC Case No. 28291 (finding no evidence of material violation warranting further investigation where the committee dealt with a very high volume of contributions and expenditures and timely filed the overwhelming majority of initial C-3 and C-4 reports). This reflects the directive in WAC 390-37-061 that PDC staff consider the amount of late-reported activity relative to the amount of activity that was timely reported by the respondent.

<sup>4</sup> PDC Case No. 53454.