

Respondent Names
SEIU Healthcare 1199 NW PAC
Complainant Name
Let's Go Washington
Complaint Description
<u>Callie Castillo</u> reported via the portal <i>(Wed, 27 Nov 2024 at 7:03 PM)</i> Please see attached letter.
What impact does the alleged violation(s) have on the public?
Please see attached letter.
List of attached evidence or contact information where evidence may be found
Please see attached letter.
List of potential witnesses with contact information to reach them
Please see attached letter.
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



CALLIE A. CASTILLO
206.223.7145
castilloc@lanepowell.com

November 25, 2024

VIA ELECTRONIC MAIL

Public Disclosure Commission
711 Capitol Way S. #206
P.O. Box 40908
Olympia, WA 98504

E-Mail: Submitted via online complaint form

Re: SEIU Healthcare 1199 NW PAC Violations of the Fair Campaign Practices Act,
Chapter 42.17A RCW

Dear Commissioners:

In accordance with RCW 42.17A.755(1) and RCW 42.17A.775, Let's Go Washington submits the following complaint against SEIU Healthcare 1199 NW PAC, a political committee, for violations of the Fair Campaign Practices Act (FCPA), Chapter 42.17A RCW.

SEIU Healthcare 1199 NW PAC is a continuing political committee. As of today, the committee reported raising \$498,054.84 and expending \$616,245.90 in the 2024 election. The committee first registered on November 27, 2007.

Violation #1: Failure to Timely File 21- & 7-Day Pre-General C4 Report

RCW 42.17A.235(2) provides in relevant part that political committees participating in a particular election must file C4 reports “[o]n the twenty-first day and the seventh day immediately preceding the date on which the election is held.” RCW 42.17A.235(2)(a) (emphasis added).

RCW 42.17A.235(4), in turn, provides that the C4 report,

filed twenty-one days before the election shall report all contributions received and expenditures made as of the end of one business day before the date of the report. The report filed seven days before the election shall report all contributions received and expenditures made as of the end of one business day before the date of the report.

(Emphasis added).

Additionally, the FCPA defines “election” as “*any primary, general, or special election for public office and any election in which a ballot proposition is submitted to the voters.*” RCW 42.17A.005(18) (emphasis added).

Finally, RCW 42.17A.005(38)(a) provides that a political committee “participates” in a particular election when it makes a monetary or in-kind contribution to a candidate for that election.

SEIU Healthcare 1199 NW PAC violated the FCPA by failing to timely file a C4 report at the 21-day and seven-day pre-general interval before the November 2024 general election. In accordance with RCW 42.17A.235, these reports were required to have been filed on October 15, 2024 and October 29, 2024 respectively.

Despite this statutory requirement, SEIU Healthcare 1199 NW PAC did not file a C4 report covering this time period until November 11, 2024, well after the election had already ended. This report contained \$432,400.00 worth of expenditures that directly went to support candidates or other political committees during the 2024 general election.

See link to form: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259941>

These disclosures were required to be filed *before* the general election but were not filed until *after* the general election.

By failing to disclose this information on time, SEIU Healthcare 1199 NW PAC violated one of the key tenets of the FCPA and RCW 42.17A.235: that the voters are entitled to view campaign finance information about political committees prior to voting.

Conclusion

In light of the above, Let’s Go Washington respectfully requests that the PDC investigate SEIU Healthcare 1199 NW PAC’s lack of compliance with the FCPA and issue an appropriate enforcement order pursuant to RCW 42.17A.755(1)(b).

Please let us know if we can be of any further assistance to the PDC in resolving this matter.

Respectfully,

LANE POWELL PC

A handwritten signature in blue ink that reads "Callie A. Castillo". The signature is fluid and cursive, with the first name "Callie" being more prominent.

Callie A. Castillo