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7 **BEFORE THE PUBLIC DISCLOSURE COMMISSION**
8 **OF THE STATE OF WASHINGTON**
9

10 In re the Matter of Enforcement Action
11 Against:

PDC CASE NO. 163092

12 SEIU HEALTHCARE 1199 NW PAC,

FINAL ORDER

13 Respondent.
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16 **I. INTRODUCTION**
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18 This matter was heard remotely by the Washington State Public Disclosure Commission
19 (PDC, Commission) on May 22, 2025, by audio and online streaming. The hearing was held
20 pursuant to Chapter 34.05 RCW, Chapter 42.17A RCW, and Chapter 390-37 WAC.

21 Commissioners present in person were J. Robert Leach, Commission Chair (presiding);
22 Douglass North, Commission Vice-Chair; and Commissioner Nancy Isserlis. Also present in
23 person or online were Assistant Attorney General John S. Meader representing the Commission;
24 Assistant Attorney General Susie Giles-Klein representing PDC staff; and Alice Fiman,
25 Compliance Manager, for PDC Staff. Carson Flora appeared online as counsel for SEIU. The
26 proceeding was open to the public and recorded.

1 The hearing concerned allegations that the Respondent violated RCW 42.17A.235 and
2 .240 for failure to timely report five expenditures totaling \$432,400 on a 7-day pre-General C-4
3 report, reporting the expenditures between 28 and 14 days late, and 7 days after the 2024 General
4 Election. The Respondent is also alleged to have violated RCW 42.17A.265 by failing to timely
5 report a \$2,400 expenditure paid on November 1, 2024. The report was filed 36 days late and
6 33 days after the 2024 General Election.

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8 The Commissioners had before them the following materials:

- 9 • Report of Investigation for Case #163092, prepared by Alice Fiman, dated May 1, 2025,
10 which included:
- 11 ○ Complaint dated and filed with the PDC on November 25, 2024;
 - 12 ○ PDC response to SEIU statement on 2024 filings dated December 4, 2024;
 - 13 ○ Response to the Complaint from SEIU Healthcare 1199 NW, dated
14 December 20, 2024;
 - 15 ○ SEIU Healthcare 1199 NW 2024 filing history;
 - 16 ○ SEIU Healthcare 1199 NW C-4 Report filed October 2, 2024;
 - 17 ○ SEIU Healthcare 1199 NW C-4 Report filed November 11, 2024;
 - 18 ○ SEIU Healthcare 1199 NW C-4 Report filed December 8, 2024;
 - 19 ○ SEIU Healthcare 1199 NW 2022 filing history.
- 20
- 21 • Proposed Stipulation as to Facts and Violations, submitted by the parties and signed on May
22 15, 2025, by Jane Hopkins RN, President, SEIU Healthcare 1199 NW PAC, and on May 19,
23 2025, by Peter Lavalley, Executive Director, for the PDC.

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25 **II. STIPULATION**

26 The parties jointly submitted a signed Stipulation as to Facts and Violations (Stipulation).

1 Ms. Giles-Klein presented the Stipulation, reviewed the aggravating and mitigating factors,
2 summarized the penalties recommended by PDC Staff, and asked the Commission to accept the
3 Stipulation. Mr. Flora was available for questions and confirmed the information provided by
4 Ms. Giles-Klein. The Respondent took responsibility and asked the Commission to accept the
5 Stipulation. The Commission voted 3-0 to accept the Stipulation as submitted.

6 7 **III. FINDINGS OF FACT**

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9 1. The Respondent, SEIU Healthcare 1199 NW PAC, is a continuing political committee
10 that has been registered with the PDC since at least 2008. The PAC is associated with SEIU
11 Healthcare 1199 NW Union. Respondent has no prior violations with the PDC.

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13 2. The Respondent received cash and in-kind contributions totaling \$1,355 699.22 during
14 the 2024 election year and reported \$613,845.90 in expenditures. The Respondent's Treasurer
15 for 2024 was listed on its PDC registration as Yolanda King-Lowe. The detailed factual
16 circumstances concerning the late reports are described in the agreed Stipulation in the Late
17 Reporting section (pages 2-3) and are incorporated by reference into this Final Order.

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19 3. A Complaint dated November 25, 2025, was filed with the PDC alleging the
20 Respondent failed to file the required C-4 reports due 21 and 7 days prior to the November, 2024,
21 election. The Respondent promptly answered the complaint and worked with PDC staff to
22 resolve the issue.

23 **IV. CONCLUSIONS OF LAW**

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25 1. The Commission has jurisdiction over this proceeding pursuant to Chapter 42.17A
26 RCW, the state campaign finance and disclosure law; Chapter 34.05 RCW, the Administrative

1 Procedure Act; and Title 390 WAC.

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3 2. Pursuant to RCW 42.17A.235 and .240, Respondent failed to timely report five
4 expenditures totaling \$432,400 on a 7-day pre-General C-4 report, reporting the expenditures
5 between 28 and 14 days late, and 7 days after the 2024 General Election. The Respondent also
6 failed to timely report a \$2,400 expenditure paid on November 1, 2024. The report was filed 36
7 days late and 33 days after the 2024 General Election.

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9 3. Mitigating factors in this case are: there is no evidence presented to the
10 Commission that Respondent's failure to timely report contributions or expenditures during the
11 month before the election was intentional and the Respondent promptly acknowledged the
12 violation once notified.

13
14 4. Aggravating factors in this case are: the Respondent is a long standing
15 continuing political committee and has been registered with the PDC since 2008. Further, the
16 Respondent's Finance Director had previously filed C-4 reports within the 21- and 7-day pre-
17 general election statutory timeframe in 2022, and should have known that the same filing
18 requirement applied to the 2024 General Election.

19 20 **V. ORDER**

21 Based upon the stipulated Findings of Fact and the Commission's Conclusions of Law,
22 the Commission accepts the agreed Stipulation of the parties as to Facts, Violations, and
23 Penalties and orders that:

- 24
25 1. The Respondent pay an aggregate civil penalty of \$6,000 for all the violations
26 with \$3,000 suspended on the following conditions:

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- 3 a. The non-suspended portion of the penalty (\$3,000) is paid by the
- 4 Respondent within 30 days of the date of the Final Order.

5 If the Respondent fails to make timely payment of the non-suspended

6 portion of the penalty, the total civil penalty of \$6,000 shall immediately

7 become due and the matter may be sent to collection or brought to

8 Superior Court as allowed by law without further action by the

9 Commission.

- 10
- 11 b. The Respondent remains in full compliance with all PDC reporting
- 12 requirements and is not found to have committed any further violations
- 13 of Chapter 42.17A RCW or Title 390 WAC within four years of the date
- 14 of this Final Order. The suspended penalty shall not be assessed based
- 15 solely upon any remediable violation, minor violation, or error classified
- 16 by the Commission as appropriate to address by a technical correction.
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18

19 So ORDERED this __27th__ day of May, 2025.

20 WASHINGTON STATE PUBLIC

21 DISCLOSURE COMMISSION

22 FOR THE COMMISSION:

23 J. Robert Leach
J. Robert Leach (May 27, 2025 14:57 PDT)

24 J. Robert Leach,
25 Chair, Public Disclosure Commission

26


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

2 Carson Flora, Counsel for SEIU Healthcare 1199 NW PAC, carsonf@seiul199nw.org.

3 Alice Fiman, PDC Compliance Manager, alice.fiman@pdc.wa.gov.

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

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Alice Fiman	
I, _____, certify that I mailed and/or emailed a copy of this order to the	
Respondent/ Applicant at his/her respective address postage pre-paid on the date stated	
herein.	
	May 27, 2025
Signed	Date

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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,
711 Capitol Way, Room 206, Box 40908, Olympia WA 98504-0908, pdc@pdc.wa.gov.

18 **NOTICE: PETITION FOR JUDICIAL REVIEW**

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










Final_Order_SEIU1199_163092-Stip

Final Audit Report

2025-05-27

Created:	2025-05-27
By:	Jana Greer (jana.greer@PDC.WA.GOV)
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-  Document created by Jana Greer (jana.greer@PDC.WA.GOV)
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-  Document emailed to j.leach@pdc.wa.gov for signature
2025-05-27 - 9:43:07 PM GMT
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-  Signer j.leach@pdc.wa.gov entered name at signing as J. Robert Leach
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