

State of Washington PUBLIC DISCLOSURE COMMISSION

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June 11, 2025

Delivered electronically to Teamsters Local 117 Working Families PAC at jennifer@teamsters117.org

Subject: PDC Case 168945 regarding Teamsters Local 117 Working Families PAC

Teamsters Local 117:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Glen Morgan on October 9, 2024. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately disclose expenditures and carry forward on C-4 reports.

Applicable Laws and Rules

<u>RCW 42.17A.235</u> describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions, in-kind donations of goods or services, and expenditures made by the campaign.

<u>RCW 42.17A.240</u> describes the required content of each campaign report including the name and address of each person making contributions and to whom an expenditure was made.

Background and Findings

- Teamsters Local 117 Working Families PAC (the Committee) was registered as a continuing political action committee during calendar year 2024 under the "Full Reporting" option and was required to disclose contributions and expenditures on C-3 and C-4 reports.
- The complaint alleged the Committee had failed to submit an accurate C-4 report for January 2024 disclosing the previous year's ending cash-on-hand balance.
- The Committee timely submitted an original C-4 report disclosing activity from January 1 to 31, 2024, on February 12, 2024. The C-4 report incorrectly identified \$18,112.12 as the beginning balance.
- On March 24, 2025, the Committee submitted an amendment to its January 2024 C-4 which included a previously unreported \$25,000 expenditure to New Directions PAC made on January 18, 2024. Additionally, the Committee adjusted the beginning balance of the January C-4 to \$43,112.12. The amendment was submitted 408 days late.

- In the response, Committee Treasurer Jennifer Shaw stated that she mistakenly believed a \$25,000 expenditure made on January 18, 2024, to New Directions PAC had been included on the original January 2024 C-4 report.
- During a review, PDC staff found that the \$25,000 contribution made by the Committee had been timely reported by the recipient, New Directions PAC.

Summary and Resolution

It appears that although the Committee used an inaccurate carry forward for the January 2024 C-4 report, the \$25,000 discrepancy was timely reported by the PAC receiving the contribution and was made outside of any accelerated election related reporting schedule. Staff found no evidence that the inaccuracy was done intentionally or otherwise meant to conceal campaign activity from the public.

The Committee completed a Statement of Understanding (SOU) and paid a \$150 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately file the January 2024 C-4 report by February 12, 2024. The \$150 penalty assessed resolves the allegations listed in this case.

Any allegations regarding reporting by the Committee for calendar year 2024 that are not otherwise addressed are hereby dismissed.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

<u>Electronically signed by Jennifer Hansen</u> Jennifer Hansen Compliance Officer <u>Electronically signed by Peter Frey Lavallee</u> Peter Frey Lavallee

Executive Director

cc: Glen Morgan