



## State of Washington

### PUBLIC DISCLOSURE COMMISSION

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### **Public Disclosure Commission Statement of Understanding Washington Health Care Association Political Action Committee PDC Cases 170823 and 170823**

I, Angela Ewing, in my capacity as Ministerial Treasurer of the Washington Health Care Association Political Action Committee (the Committee), hereby acknowledge that during election years 2021, 2023, 2024, and 2025, the Committee violated RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately file Cash Receipts, Monetary Contributions (C-3) and Receipts & Expenditure Summary (C-4) reports.

The facts are as follows:

- The Committee is registered as a continuing political committee under the Full Reporting option. The most recent Committee Registration (C-1pc) was submitted on May 24, 2024.
- The Committee took part in elections by contributing to candidates or PACs in elections spanning from 2021 to 2025.
- During calendar year 2021, the Committee filed C-4 report #110061181 one month late on November 10, 2021. This C-4 reported \$82,750.50 in contributions and \$17,134 in expenditure. The Committee's C-3 reports were filed timely. Contributions to the Committee came from member organizations and the total raised in 2021 was \$252,619.30. The Committee's total expenditure in 2021 was \$33,969. The sole election-related expenditure was to The Truman Fund for \$6,000, paid September 24, 2021, due on the 21-day pre-general C-4 report but not reported until November 10, 2021.
- During calendar year 2023, the Committee filed 6 C-3 reports between one week and 30 days late, disclosing a total of \$103,687.25 in contributions. One C-3 was filed 19 months late, disclosing a contribution of \$1,200. The corresponding C-4 reports were amended in 2023 to adjust for the contribution changes and there were no changes to expenditures. The total raised by the Committee in 2023 was \$377,406.38, and total expenditure that year amounted to \$238,337.36. Expenditures in 2023 were primarily as contributions to candidates or PACs.

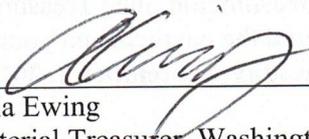
- During calendar year 2024, the Committee filed 12 C-3 reports 3 weeks to 9 months late, disclosing a total of \$7,408.75 in contributions. There were 6 C-4 reports filed between 3 and 15 months late for a total of \$43,515.15 in expenditure. Many of the C-4 reports were amended to address a carry forward issue found in the 2025 reporting. The total raised by the Committee in 2024 was \$51,189, and total expenditure that year amounted to \$241,954.05. Expenditures in 2024 were primarily as contributions to candidates or PACs.
- In addition to the late reporting, in calendar year 2024 the Committee submitted C-4 report #110243150, disclosing a \$10,000 expenditure in August that failed to report the full name of the contribution recipient. This issue was resolved on June 1, 2025, by amended C-4 #110287087, which identified the full name of the recipient as “No on 2124.”
- Between January 1, 2025, and the 7-day pre-primary deadline, the Committee filed 46 C-3 reports disclosing \$77,738.80 in contributions.
  - Five reports from January were submitted on June 12, 2025, 4 months late, totaling \$19,515.13 in contributions.
  - Three reports from February were submitted on April 9, 2025, 1 month late, totaling \$263.25 in contributions.
  - March C-3s were submitted timely.
  - One report from April was submitted 2 days late, on May 14, 2025, totaling \$13,500 in contributions; one report from April was submitted on June 1, 2025, 3 weeks late, totaling \$1,500 in contributions; and one report from April was submitted on May 14, 2025, 2 days late, totaling \$2,750 in contributions.
  - May, June, and July C-3s were submitted timely.
- Between January 1, 2025, and the 7-day pre-primary deadline, the Committee filed 9 C-4 reports disclosing \$34,072.90 in expenditures. Expenditures in this period were primarily as contributions to candidates or PACs.
  - The C-4 for January was submitted on April 9, 2025, 2 months late, disclosing \$3,553.53 in expenditures.
  - The C-4 for February was submitted on April 9, 2025, 1 month late, disclosing \$3867.42 in expenditures.
  - The C-4 for March was submitted timely.
  - The C-4 for April was submitted on May 14, 2025, 2 days late, disclosing \$3553.53 in expenditures.
  - The C-4 for May was submitted on June 12, 2025, 2 days late, disclosing \$3867.42 in expenditures.
  - The C-4 for June was submitted timely.
  - For the C-4s submitted January through June 2025, there were no expenditures supporting or opposing a candidate or ballot measure.

- The C-4 for July 1 – 14, 2025, submitted on July 24, 2025, was 9 days late, disclosing \$7,214.95 in expenditures primarily to candidates.
- The C-4 for July 15 – 28, 2025, submitted on July 29, 2025, was submitted timely.

The Committee would like to avoid the time and expense of a Brief Adjudicative Proceeding (Brief Enforcement Hearing). Therefore, in lieu of a hearing, the Committee acknowledges that it violated Washington state law as described above and agrees to enter this *Statement of Understanding* (SOU) to resolve the above matter with the Public Disclosure Commission (PDC).

In accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143, the Committee agrees to pay a total combined civil penalty of \$450. This combined penalty includes a \$150 civil penalty for an acknowledged 1<sup>st</sup> violation of RCW 42.17A.235 and .240 in calendar years 2021 and 2023; a \$150 civil penalty for an acknowledged 2<sup>nd</sup> violation of RCW 42.17A.235 and .240 in calendar year 2024; and a \$150 civil penalty for an acknowledged a 3<sup>rd</sup> violation of RCW 42.17A.235 and .240 between January 1 and July 29, 2025.

The Committee understands that, by signing this SOU, it acknowledges the violations of Chapter 42.17A RCW set forth above and waives its right to a hearing in this matter. The Committee further understands that signing this SOU and returning it to the PDC with a payment for the \$450 civil penalty will resolve the issue of late and inaccurate fundraising and expenditure reporting in calendar years 2021, 2023, 2024, and for the period of January 1 to July 29, 2025, indicated above.

  
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Angela Ewing  
Ministerial Treasurer, Washington Health Care Association  
Political Action Committee

08/26/2025  
Date Signed

The signed Statement of Understanding (SOU) and \$450 penalty payment is due by **Tuesday, September 2, 2025**. See the options below for how to continue with either online, by mail, or in-person processing.

#### **Electronic Payment Option**

Please be aware, processing fees may apply. To start the process for making online payment, do the following:

Email an electronic copy of the signed SOU to the Compliance Officer assigned to your case.

- A photo or scan of the signed SOU is acceptable. Do make sure that all parts of the SOU are within focus and readable.
- To email the signed SOU to your Compliance Officer, reply directly to the last email you had with the Compliance Officer and attach the document.
- The Compliance Officer must receive the signed SOU no later than **Friday, August 29, 2025**.
  - o A signed SOU is required for the terms of the agreement to be fulfilled.
  - o If we do not receive the SOU, your case will be scheduled for the next available Brief Adjudicative Proceeding (BAP). If this occurs, the Commission's Presiding Officer will hear the case.
  - o If you send the SOU and payment electronically, you DO NOT need to mail a hard copy of the SOU to your Compliance Officer

Once the SOU is received, PDC staff will email a payment link and further instructions about how to make a payment.

- You must send the payment, via the link, no later than **Tuesday, September 2, 2025**.

#### **Mail or In-Person Payment Option**

To pay by check or money order, make the payment payable to "Washington State Treasurer," write your PDC Case Number in the Memo field, and have delivered the payment and your signed SOU to one of the addresses listed below, no later than **Tuesday, September 2, 2025**.

Regular mail:

Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504-0908

Overnight mail or in-person delivery:

Public Disclosure Commission  
711 Capitol Way S, STE 206  
Olympia, WA 98501-1267