

State of Washington PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission Statement of Understanding American Federation of Teachers PAC on Political Education PDC Case 176600

I, <u>Somma Rath</u>, Financial Manager and representative of American Federation of Teachers PAC on Political Education (the Committee), hereby acknowledge that during election year 2025, the Committee violated RCW 42.17A.235 and .240 by failing to timely disclose expenditures on Summary Expenditure Reports (C-4).

The facts are as follows:

- The Committee is a Continuing Committee, registered with the PDC under the Full Reporting option.
- C-4 reports are due monthly from the beginning of a campaign through May of the election year. If a campaign has more than \$750 in contributions or expenditures during a month, the C-4 is due to be filed by the 10th of the following month.
- Starting in June of the election year and continuing through the primary and general elections, C-4 reports are due 21 and 7 days before each election, and on the 10th of the month after the election in which any committee is participating.
- The Committee participated in the 2025 Primary election, listing monetary contributions beginning in June 2025 to registered candidates.
- Instead of the 21- and 7-day pre-primary reports, the Committee filed C-4s monthly, filing a C-4 covering July 2025 on August 15, 2025. The C-4 report filed August 15, 2025, listed \$7,625 in expenditures, with \$1,625 made during the 21-day pre-primary reporting period and \$6,000 made during the 7-day pre-primary reporting period. These were required to be reported July 15 and 29, respectively.
- In February 2025 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.

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

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violated Washington state law as described above and agrees to enter into 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 \$300 penalty for its second acknowledged violation of 42.17A.235 and .240 for failure to timely file C-4 reports.

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 \$300 civil penalty will resolve the issue of violations of RCW 42.17A.235 and .240 for failure to timely disclose expenditures on C-4 reports for election year 2025 indicated above and as described in PDC Case 176600.

Somma Rath, Representative for the Committee

The signed Statement of Understanding (SOU) and \$AMT penalty payment is due by **DATE**. 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 an 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 **DATE**.
 - 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 **DATE**.

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 <u>mail</u> or <u>deliver</u> the payment **and your signed SOU** to one of the addresses listed below, no later than **DATE**.

Regular mail:

Overnight mail or in-person delivery:

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