

State of Washington
PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission Statement of Understanding
UFCW UNION LOCAL 367 POLITICAL ACTION COMMITTEE FUND
PDC Case 176604

I, RENEE S HANNEKEN, FINANCIAL ADMINISTRATOR of UFCW UNION LOCAL 367 POLITICAL ACTION COMMITTEE FUND (the Committee), hereby acknowledge that, during election year 2025, the Committee violated RCW 42.17A.235 and .240 by failing to timely report expenditures.

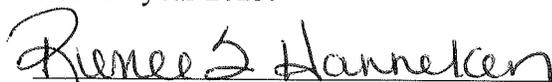
The facts are as follows:

- The Committee is registered with the PDC as a continuing political committee and selected the full reporting option in 2025. The Committee participated in the 2025 Primary Election by making contributions to candidates participating in the election.
- Summary Expenditure (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.
- Here, the Committee was required to file 21-day and 7-day pre-Primary C-4 reports with the PDC on July 15, 2024 and July 29, 2025, respectively. However, the Committee submitted two C-4 reports for the periods covering the 21-day and 7-day pre-Primary report on July 30, 2025. The 7-day pre-Primary C-4 report was filed 14 days late, and the 21-day pre-Primary report was filed one day late.
- On July 30, 2025, the Committee amended a C-4 report originally filed February 5, 2025 and reported two previously undisclosed expenditures made January 28, 2025 for signature gathering. These expenditures, made to Washington Community Action Network, totaled \$227,142 and were reported 170 days late.

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 into this Statement of Understanding (SOU) to resolve the above matter with the PD

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 \$750 penalty for two acknowledged violations of RCW 42.17A.235 and .240 for failing to timely file reports and disclose expenditures.

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 \$750 civil penalty will resolve the issue of late reported contributions and expenditures for election year 2025.



RENEE S HANNEKEN
FINANCIAL ADMINISTRATOR



Date Signed