



State of Washington
PUBLIC DISCLOSURE COMMISSION

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May 31, 2023

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Citizens for Ridgefield Schools PAC, PDC Case 112205

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 5, 2023. The complaint alleged that Citizens of Ridgefield Schools, a Single Election Committee in the 2022 election cycle, may have violated RCW 42.17A.220 for accepting overlimit anonymous contributions and RCW 42.17A.205, .235, and .240 for failure to timely register as a political committee and report contribution and expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements for a political party committee; the applicable C3 and C-4 reports; the reporting requirement(s) pertinent to the committee registration and anonymous/unidentified contributions statutes; and the response to the complaint received from Alicia Lasch, Treasurer, on behalf of Citizens for Ridgefield Schools PAC (Committee).

Based on staff's review, we found the following:

- On December 7, 2021, the Committee timely filed a Committee Registration (C-1pc report) as a Political Action Committee for the February 2022 special election, selecting the "Full Reporting" Option, and listing Mike Bomer as the Committee treasurer. Staff noted that the Committee participated in three elections in the 2022 election year (February special, April special, and August primary) and was required to file three separate committee registrations for each election cycle. The Committee failed to file the April special election C-1pc and filed the August primary C-1pc on October 17, 2022, 151 days after it was due.
- Beginning June 1, 2022, the Committee was required to file Cash Receipts Monetary Contribution (C-3) reports every Monday, for deposits made during the previous seven days (Monday – Sunday). In addition to the C-3 reports, the Committee was also required to file Summary, Full Report Receipts and Expenditures (C-4) report for the month of May 2022, including all the C-4 reports required during the accelerated reporting period beginning June 1 – August 31, 2022. Staff noted that the Committee did not file the required C-3 and C-4 reports until February 6, 2023, and March 24, 2023, 188 and 234 days, respectively, after the deadline.

- Regarding the alleged violation of RCW 42.17A.220, you attached a C-3 report filed by the Committee on February 6, 2023, depicting an overlimit anonymous contribution to the Committee in the amount of \$5,407. Staff review found that the new treasurer, Alisha Lasch, who took over duties of the Committee treasurer from Michael Bomer, inadvertently filed the Feb 6, 2023, C-3 report showing an overlimit anonymous contribution. The prior treasurer, Michael Bomer had already filed a C-3 report on February 3, 2022, identifying the source of the contribution and contributor as LSW Architects (C-3 report # 110071965).
- On March 14, 2023, the Committee, by way of the new Committee treasurer, Alisha Lasch, submitted a response to the complaint stating: “I took over as treasurer of this group in April 2022. When I took over the task of PDC filing requirements was never mentioned to me as part of my duties. I have no experience with PDC filings as the other organizations I have been involved in as treasurer did not have this requirement. It wasn’t brought to my attention until October 2022 that I needed to be doing these filings. We had two campaigns during this time. April 2022 Bond and August 2022 levy. I submitted these filings on the information I had available and to the best of my knowledge.”
- On May 26, 2023, the PDC staff received an executed Statement of Understanding (SOU) signed and dated by the Committee’s treasurer, Alicia Lasch, along with a \$150 check for the penalty payment. The signed SOU acknowledged two violations of RCW 42.17A.205 for failure to timely register as a political committee and RCW 42.17A.235 for failure to timely and accurately report contributions and expenditures undertaken by the Committee during the 2022 April special and August primary election cycles.

Based on the above review, the PDC staff has determined that, in this instance, the failure to timely file the 21 and 7-Day Pre-Primary C-4 reports for the 2022 election cycles, including the failure to timely file Campaign Registrations (C-1pcs) that were required for the April special and August primary elections, do not warrant further investigation.

The Committee acknowledged the violations and took responsibility by filing the missing reports and the Committee Registration (C-1pc). The Committee also completed a SOU and paid a \$150 civil penalty.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

s/ _____
Erick O. Agina, Compliance Officer

s/ _____
Peter Frey Lavalley, Executive Director

cc: Alicia Lasch, Committee Treasurer