



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

December 1, 2023

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Citizens for Schools Walla Walla, PDC Case 142028

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 30, 2023. Your complaint alleged that Citizens for Schools Walla Walla may have violated RCW 42.17A.235, .240, and .445 and WAC 390-16-037, as follows:

- RCW 42.17A.235 and .240 by failing to timely report contributions and expenditures;
- RCW 42.17A.445 for the possible personal use of contributions based on reports that include discrepancies in balances carried from one report to the next report; and
- WAC 390-16-037 for failing to properly describe expenditures on reports.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Citizens for Schools Walla Walla; the applicable PDC reports filed by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

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

- Citizens for Schools Walla Walla is a political committee that has been reporting to the PDC since at least 2012. Jolene Riggs has been the committee's treasurer since 2015. The PAC supports ballot propositions of Walla Walla School District 140.

**C-4 Report 8/1/18 – 8/31/18 Amended 10/12/23**

- On October 12, 2013, Ms. Riggs amended the C-4 report covering the reporting period 8/1/18 – 8/31/18, originally filed 9/9/18, by adding the number of T-Shirts purchased (100) for \$653.40. The amended description was filed five years and one month late.
- On the same amended C-4 report, the description for a \$728.23 expenditure was corrected to disclose that 2,000 flyers were printed.

#### **C-4 Report 9/1/18 – 10/15/18 Amended 10/12/23**

- On October 12, 2013, Ms. Riggs amended the C-4 report covering the reporting period 9/1/18 – 10/15/18, originally filed 11/18/18, by adding additional detail describing several expenditures, as follows:
  - \$9,166.48 "1000 Yard Signs"
  - \$359.37 "30 Parade Signs"
  - \$3,063.23 "2000 Additional Yard Signs"
  - \$597.74 "2000 Flyers in Spanish"
  - \$1,034.65 "1000 Door Hangers"
  - \$9,965.00 "28 Ads for Oct & Nov" (In the Walla Walla Union Bulletin newspaper)
  - \$1,508.00 "52 Radio Spots each: KHET, KWHT-FM, KWVN-FM, 10/17/18-11/6/18"
  - \$979.00 "Postage for mailing 3573 Postcards"
  - \$2,585.67 "Printing & Prep for 3573 postcards"

#### **C-4 Report 12/1/18 – 12/31/18 – Amended 10/18/23**

- On October 18, 2013 Ms. Riggs amended the C-4 report covering the reporting period 12/1/18 – 12/31/18, originally filed 12/31/18, by adding additional detail describing several expenditures, as follows:
  - \$378.00 "Radio Ads 11/2-11/5/18 9 spots each: KUJ, KZIU, 104.5 BOB"
  - \$1,451.38 "Postage for 2<sup>nd</sup> postcard mailing-5297"
  - \$3,667.35 "Printing & prep of 2<sup>nd</sup> postcard mailing-5297"
- In addition, the amended report for the period 12/1-12/31/18 included two additional expenditures:
  - \$395.28 "Dumtper rental & refuse dispose of signs"
  - \$92.00 listed under Non-Itemized expenditures. This was for the committee's PO Box rental. What appeared to be a missing \$92.00 was caused by not initially reporting the Post Office Box rental and was not a personal use of campaign funds.
- By reporting these additional expenditures on the amended last report for 2018, the amount carried forward from Line 18, \$2,752.05, now equals the Line 1 starting balance for the first C-4 report in 2019.

#### **Late Reporting of C-4 Reports**

- The C-4 report covering the period 4/1/20 – 4/30/20 was filed three years and six months late. However, no contributions were received during this period and expenditures totaled \$106.
- The C-4 report covering the period 5/1/20 – 5/31/20 was filed three years and five months late. However, there were no contributions received or expenditures made.
- Because the contribution and expenditure activity for these two reports did not exceed \$200, the reports were not required to be filed.

In several instances Citizens for Schools Walla Walla did not provide the detailed expenditure descriptions contemplated by WAC 390-16-037. When this matter was brought to the attention of the committee's treasurer, she filed amended reports even though many of the alleged violations were beyond the statute of limitations. In addition, the discrepancy of \$92.00 from the ending C-4 report for 2018 and the starting report for 2019 was identified and corrected.

However, pursuant to WAC 390-37-060(1)(d), Citizens for Schools Walla Walla will receive a formal written warning concerning its failure to include the detailed expenditure descriptions contemplated by WAC 390-16-037. The formal written warning will include staff's expectation that Citizens for Schools Walla Walla will disclose the detailed expenditure descriptions contemplated by WAC 390-16-037 in future reports and that C-4 reports will be filed timely and accurately. The Commission will consider the formal

written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,  
*Electronically Signed Philip E. Stutzman*  
Phil Stutzman  
Compliance Officer

Endorsed by,  
*Electronically Signed Peter Frey Lavallee*  
Peter Frey Lavallee  
Executive Director

cc: Citizens for Schools Walla Walla, Jolene Riggs, Treasurer