



State of Washington

**PUBLIC DISCLOSURE COMMISSION**

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**Public Disclosure Commission Statement of Understanding  
Citizens for Spokane Schools PAC  
PDC Cases 141989**

I, Tim Kestell, Chair, Citizens for Spokane Schools PAC, hereby acknowledge that during the period June 10, 2019 to April 30, 2022, Citizens for Spokane Schools PAC violated RCW 42.17A.235 and 42.17A.240 by failing to timely report contributions totaling \$2,297.93 on PDC Form C-3 (Cash Receipts Monetary Contributions) and contributions totaling \$71,441.33 and expenditures totaling \$75,752.08 on PDC Form C-4 (Summary, Full Report Receipts and Expenditures).

The facts are as follows:

- Citizens for Spokane Schools PAC (PAC or Committee) filed four C-3 Reports between 58 and 364 days late. The C-3 reports totaled \$2,297.93 and were due between 12/10/2019 and 8/10/2021.
- The Committee filed 15 C-4 Reports between 7 and 549 days late. The C-4 reports totaled \$71,441.33 in contributions and \$75,752.08 in expenditures and were due between 6/10/2019 and 3/10/2022.
- Of the \$71,441.33 in total late-filed C-4 Report contributions, all but \$2,297.93 were timely reported on C-3 Reports.
- Of the \$75,752.08 in total late-filed expenditures, all but \$914.82 were filed 7 days late.
- The largest late-filed C-4 Report was filed 7 days late and included \$39,410 in contributions and \$74,837.26 in expenditures. The contributions were timely reported on C-3 Reports.
- The Committee denied that the PAC absconded with \$27.10 over the course of its formation, stating that this amount was attributed to a simple bookkeeping oversight while reconciling bank fees and fee refunds.

- The alleged unexplained starting balance of \$1,896.79 on the first C-4 report for the 2024 campaign, covering the period 4/1/2021 to 4/30/2021, was a carry forward to the 2024 campaign from the 2021 campaign. It is identified on the final 2021 C-4 Report, covering the period 3/1/2021 to 3/31/2021, as an expenditure on 3/31/2021 to the 2024 campaign, described as “carry forward cash to 2024 election.” The report was timely filed on 4/5/2021.


### **Mitigating Factors**

- The 2018 records for Citizens for Spokane Schools PAC were incomplete and unreported due to the illness and subsequent death of the PAC treasurer, Ellen Robey, on May 12, 2020. Even though Ms. Robey failed to file several C-4 reports in a timely manner during her illness, the campaign timely filed all but four C-3 reports during the preceding five years.
- Once the campaign records were obtained from the estate of Ms. Robey, the committee located a new treasurer (Barbara Marney) who assumed her duties in November 2020. Ms. Marney completed the 2018 reports and brought the 2021 records up to date by January 2021.

I would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding. Therefore, in lieu of PDC staff scheduling a hearing, I am entering into this *Statement of Understanding* (SOU) to resolve this matter.

In accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in [WAC 390-37-143](#), I agree to the assessment of a \$300 penalty for the acknowledged violations of RCW 42.17A.235 and .240 for failing to timely file C-3 and C-4 Reports of contributions and expenditures.

I understand that, by completing this SOU, I acknowledge the violations of Chapter 42.17A RCW set forth above and waive my right to a hearing in this matter. I further understand that signing this SOU and returning it to the PDC with a payment for the \$300 civil penalty will resolve the issue of late-filed C-3 and C-4 Reports of contributions and expenditures as noted above.

  
\_\_\_\_\_  
Tim Kestell, Chair, Citizens for Spokane Schools PAC

7.10.2024  
\_\_\_\_\_  
Date Signed

For Online payment options and information, please see below.

**Online Payment Option:**

To make an online payment, Email [payments@pdc.wa.gov](mailto:payments@pdc.wa.gov)

A payment link will be sent to you, in which you will need to provide the following information:  
(1) Case Number (141989); and (2) Respondent's Name (Citizens for Spokane Schools PAC)

In addition, processing fees may be applicable.

To mail or deliver a check or money order, see below:

**For Regular Mail:**

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

**For Overnight Mail or In-Person Delivery:**

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

Please make your check or money order payable to the "**Washington State Treasurer**" and be sure to include PDC Case Number 141989 in the memorandum field.

Kindly mail or deliver this SOU and your payment by no later than **Friday, July, 12, 2024.**

**Thank you for making an online payment of \$300.00, received 06/26/24.**