



State of Washington
PUBLIC DISCLOSURE COMMISSION
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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

PDC Case 141631

Bethel Citizen's Committee for School
Support,

Findings of Fact,
Conclusions of Law, and
Order Imposing Fine

Respondent.

Pursuant to the Brief Enforcement Hearing (Brief Adjudicative Proceeding) notice sent to Bethel Citizen's Committee for School Support on August 6, 2024 and August 7, 2024, a Brief Adjudicative Proceeding was held on September 12, 2024, remotely from Olympia, WA by live audio and online transmission, to consider whether Bethel Citizen's Committee for School Support violated RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately file *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) disclosing contributions and expenditures undertaken by the committee in years 2019-2022 for election year 2022.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Vice-Chair J. Robert Leach was the Presiding Officer. The Commission staff was represented by Tabatha Blacksmith, Compliance Officer. Bethel Citizen's Committee for School Support (the "Respondent") did not attend or participate in the hearing or submit any written materials.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent is a continuing political committee that registered for election year 2022 and reported contribution and expenditure activity for years 2019-2022.
2. As a committee that indicated their support for a Bethel School District 403 levy, bond or advisory vote in a 2022 Special Election, the Respondent was required to file C-3 and C-4 reports that were due based upon the election cycle, the committee's election participation, and their financial activity.

3. The Respondent failed to file the following reports before the date of the enforcement hearing: 1) missing C-4 reports disclosing a total of \$22,803.82 in contributions that were deposited in 2019, 2020, and 2022; and 2) a \$90.40 reimbursement received in 2020 for a cancelled service.
4. The Respondent failed to accurately file four monthly C-4 reports, two pre-election C-4 reports, and one C-3 report for 2021 and 2022 activity, which were not remedied before the date of the enforcement hearing. Amendments are needed to: 1) disclose contributions totaling \$5,702.51; 2) make corrections to two reports; and 3) amend six C-4 reports that lack expenditure descriptions.
5. The Respondent failed to timely file: 1) two pre-election C-4 reports and one monthly C-4 report for 2022 disclosing a total of \$7,149.19 in election-related expenditures, which were submitted after the elections; 2) one post-election C-4 report and one monthly C-4 report for 2022 disclosing \$2,827.76 in election-related expenditures; 3) two additional monthly C-4 reports for 2022; and 4) nine C-3 reports for 2019, 2020 and 2021 activity.
6. The Respondent has no prior violations of RCW 42.17A.235 or RCW 42.17A.240 within the PDC's five-year statute of limitations.

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately report contributions and expenditures for years 2019-2022.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED that the Respondent is assessed a total civil penalty of \$600 in accordance with the penalty schedule set forth in WAC 390-37-143.**
2. **It is further ordered that the Respondent:**
 - a. **File the missing and amended reports as described in the above Findings of Facts (items 3 and 4) within 30 days of the date of this Order.**
3. **It is further ordered that \$350 of the \$600 penalty is suspended if all the following conditions are timely met:**

- a. **The Respondent pays the non-suspended portion of the penalty (\$250) within 30 days of the date of this Order. If the Respondent fails to pay the \$250 non-suspended penalty within 30 days, PDC staff is directed to refer the matter to collections.**
- b. **The Respondent files the missing and amended reports described in the above Findings of Facts (items 3 and 4) within 30 days of the date of this Order.**
- c. **If the Respondent fails to pay the non-suspended \$250 penalty and/or file missing and amended reports within 30 days, the suspended portion of the penalty (\$350) shall also immediately become due without further action by the Commission, and PDC staff is directed to refer the full penalty amount (\$600) to collections.**

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 8th day of October, 2024.

Public Disclosure Commission

Electronically signed Peter Frey Lavallee

Peter Frey Lavallee

Executive Director

I, Tabatha Blacksmith, certify that I mailed a copy of this order to the Respondent at their respective address postage pre-paid, and by email on the date stated herein.

Electronically Signed Tabatha Blacksmith
Signed

Oct. 8, 2024
Date

APPEALS OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request orally or in writing, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1). Staff may ask for written confirmation of oral requests for review.
- **REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE POSTMARK DATE OF THIS INITIAL ORDER.** Written requests for review should be delivered electronically to the Washington State Public Disclosure Commission by email at pdcc@pdcc.wa.gov

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the final order. *See* WAC 390-37-142(5).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.552.