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7 **BEFORE THE PUBLIC DISCLOSURE COMMISSION**
8 **OF THE STATE OF WASHINGTON**

9 In re the Matters of Enforcement Action
10 Against:

11 KAREN JENSEN and CITIZENS FOR A
12 BETTER ENUMCLAW,

13 Respondents.

PDC CASE No. 6333

FINAL ORDER

14 **I. INTRODUCTION**

15 This matter came before the Washington State Public Disclosure Commission on
16 September 19, 2019, at the PDC office, 711 Capitol Way, Room 206, Olympia, Washington. A
17 hearing was held in accordance with Chapters 34.05 and 42.17A RCW and Chapter 390-37
18 WAC. The hearing concerned allegations that Karen Jensen and Citizens for a Better Enumclaw
19 violated RCW 42.17A.405(2) and RCW 42.17A.240 by making over limit in-kind contributions
20 to Darrel Dickson, a candidate for Enumclaw City Council, and for failing to report those
21 contributions as in-kind rather than independent expenditures. A separate case against Mr.
22 Dickson (PDC Case #6365) for accepting the in-kind contributions and failing to report them
23 was separately resolved by stipulation. The Commission did not rely on the outcome of that
24 case when considering this matter.
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II. PROCEDURAL HISTORY

1. On December 21, 2018, PDC Staff issued a Notice of Administrative Charges and Enforcement Hearing Notice for PDC Case 6333.

2. The Presiding Officer issued the following orders for PDC Case 6333 prior to the hearing:

- Pre-Hearing Conference Order and Notice of Hearing dated January 22, 2019 (Anne Levinson, Presiding Officer);
- Status Conference and Scheduling Order, dated February 25, 2019 (William Downing, Presiding Officer);
- Amended Status Conference and Scheduling order, dated February 28, 2019;
- Order on Motion to Quash the Subpoena Duces Tecum, dated April 4, 2019;
- Order on Motion for Continuance and Amended Scheduling Order, dated May 1, 2019;
- Order on Motion to Quash Second Subpoena Duces Tecum, dated May 3, 2019;
- Agreed Order on Motion for Continuance and Amended Scheduling Order, dated May 24, 2019, scheduling the hearing for September 19, 2019.

3. Commissioners present at the hearing were Anne Levinson, Commission Chair; David Ammons, Commission Vice-Chair; and Commissioners William Downing (presiding), and Russell Lehman. Also present were: Assistant Attorney General John S. Meader representing the Commission; PDC Executive Director Peter Lavalley; PDC staff member Jana Greer as recorder of the proceedings, and Respondent Karen Jensen.

4. Assistant Attorney General Chad C. Standifer, represented PDC Staff.

1 5. Respondents Karen Jensen and Citizens for a Better Enumclaw were represented
2 by attorney John White.

3 6. The proceeding was open to the public and recorded.

4 7. Respondents' Motions in Limine were ruled on by the Presiding Officer and a
5 separate order issued. The rulings were summarized at the hearing as follows:

- 6 • Motion to exclude complaint – Denied;
- 7 • Motion to exclude witness interviews, interview summaries, and
- 8 responses to staff questions – Denied;
- 9 • Motion to exclude hearsay testimony from Conner Edwards – Denied;
- 10 • Motion to preclude Conner Edwards from testifying on state of mind –
- 11 Granted;
- 12 • Motion to exclude reference to witnesses who were not called to testify –
- 13 Denied;
- 14 • Motion to exclude non-party witnesses from the hearing room and from
- 15 observing proceedings via the Internet or other media – Granted;
- 16 • Motion to provide 24-hour notice of witnesses to be called – Denied;
- 17 • Motion to preclude any reference to these Motions in Limine – Denied.

18 8. Respondents' Motion for Partial Summary Judgment, filed August 30, 2019, was
19 denied by the Presiding Officer. The Presiding Officer found that there were genuine
20 issues of material fact in dispute and that the moving party was not entitled to judgment
21 as a matter of law.

22 9. The parties jointly submitted a signed partial Stipulation as to Facts and asked the
23 Commission to accept the Stipulation. The Stipulation was filed on September 18, 2019,
24 two days after the deadline in the Case Scheduling Order. The Presiding Officer waived
25 the deadline and accepted the Stipulation.

1 10. PDC Staff offered the following exhibits, which were admitted into evidence at
2 the hearing:

3 Ex. 1. Complaint dated July 5, 2016, filed by Christopher Hurst (23 pages);

4 Ex. 2. Committee Registrations: C1pc for Citizens for a Better Enumclaw
5 (718 Griffin Avenue #920, Enumclaw, WA), filed by Karen Jensen,
6 September 24, 2015; Amended C1pc of Citizens for a Better Enumclaw
7 (718 Griffin Avenue #920, Enumclaw, WA), filed by Karen Jensen,
8 October 20, 2015; C1pc of Friends of Darrel Dickson for City Council
9 (3265 Phillips Ave., Enumclaw, WA), filed by Hugh Hales, July 15, 2015;
10 and Amended C1pc of Friends of Darrel Dickson for City Council,
11 changing name to Concerned Citizens of Enumclaw (718 Griffin Avenue
12 #920, Enumclaw, WA), filed by Hugh Hales, September 18, 2015 (6
13 pages);

14 Ex. 3. Letter dated August 5, 2016, from John White on behalf of Karen Jensen
15 (2 pages);

16 Ex. 4. Interview Summary, Karen Jensen, April 24, 2018 (3 pages);

17 Ex. 5. Letter dated August 4, 2016, from Robert Dickson on behalf of
18 Darrel Dickson with Exhibits A-F (13 pages);

19 Ex. 6. Letter dated July 24, 2018, from Robert Dickson on behalf of
20 Darrel Dickson (4 pages);

21 Ex. 7. Emails among Conner Edwards, Darrel Dickson, and others, dated
22 September 21-22, 2015 (2 pages);

23 Ex. 8. Interview Summary, Darrel Dickson, June 14, 2018 (3 pages);

24 Ex. 9. Interview Audio Recording, Darrel Dickson, June 14, 2018;

25 Ex. 10. Interview Summary, Hugh Hales, June 14, 2018 (2 pages);

26 Ex. 11. Interview Audio Recording, Hugh Hales, June 14, 2018;

1 Ex. 12. Interview Summary, Holly Dickson, June 14, 2018 (2 pages);
2 Ex. 13. Interview Audio Recording, Holly Dickson, June 14, 2018;
3 Ex. 14. Pam Roach's response to questions, dated July 31, 2018 (3 pages);
4 Ex. 15. Interview Summary, Pam Roach, October 15, 2018 (4 pages);
5 Ex. 16. Interview Audio Recording, Pam Roach, October 15, 2018;
6 Ex. 17. Interview Summary, Conner Edwards, February 8, 2017 (23 pages);
7 Ex. 18. Interview Audio Recording, Conner Edwards, February 8, 2017;
8 Ex. 19. Interview Summary, Conner Edwards, November 15, 2018 (4 pages);
9 Ex. 20. Interview Audio Recording, Conner Edwards, November 15, 2018;
10 Ex. 21. Emails among Conner Edwards, Darrel Dickson, and others, dated
11 September 21, 2015 (9 pages);
12 Ex. 22. Emails among Conner Edwards, Darrel Dickson, and others, dated
13 September 21, 2015 (2 pages);
14 Ex. 23. Emails among Conner Edwards, Darrel Dickson, and others, dated
15 September 22, 2015 (2 pages);
16 Ex. 24. Email from Conner Edwards to Karen Jensen, dated September 23, 2015
17 (1 page);
18 Ex. 25. Emails among Conner Edwards, Darrel Dickson, and others, dated
19 September 26-28, 2015 (2 pages);
20 Ex. 26. Email from Conner Edwards to Karen Jensen and TEKS Services, dated
21 September 28, 2015 (1 page);
22 Ex. 27. Email from TEKS Services to Conner Edwards, dated
23 September 29, 2015 (1 page);
24 Ex. 28. Emails among Conner Edwards, Darrel Dickson, Karen Jensen, and
25 others, dated September 21-30, 2015 (6 pages);
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1 Ex. 29. Email from Conner Edwards to TEKS Services, dated
2 September 30, 2015 (1 page);
3 Ex. 30. Email from Darrel Dickson to Conner Edwards and Holly Dickson, dated
4 September 17, 2015 (1 page);
5 Ex. 31. Email from Darrel Dickson to Conner Edwards, dated
6 September 16, 2015 (1 page);
7 Ex. 32. Email from Holly Dickson to Conner Edwards, dated September 20,
8 2015 (1 page);
9 Ex. 33. Emails between Holly Dickson and Conner Edwards, dated
10 September 24, 2015 (3 pages);
11 Ex. 34. Cell Phone Records of Darrel Dickson, September 2, 2015-
12 October 1, 2015 (13 pages);
13 Ex. 35. Transcript of the Deposition of Conner Edwards, May 9, 2019
14 (171 pages);
15 Ex. 36. Emails among Conner Edwards, TEKS Services, and Karen Jensen,
16 September 23-October 8, 2015 (1 page);
17 Ex. 37. Email from Conner Edwards to Karen Jensen, with attachment,
18 September 23, 2015 (3 pages);
19 Ex. 38. Emails among Conner Edwards, Karen Jensen, Holly Dickson,
20 Darrel Dickson, and Pam Roach, September 26, 2015 (4 pages);
21 Ex. 39. Emails between Rob Dickson, Darrel Dickson, Holly Dickson, and
22 Conner Edwards, September 29-30, 2015 (5 pages);
23 Ex. 40. Emails between Conner Edwards, Darrel Dickson, Holly Dickson, and
24 Pam Roach, October 18, 2015 (2 pages);
25 Ex. 41. Email from Pam Roach to Darrel Dickson and Holly Dickson,
26 October 18, 2015 (1 page);

1 Ex. 42. Emails between Conner Edwards and Karen Jensen, October 12, 2015
2 (2 pages); and
3 Ex. 43. Email from Conner Edwards to Darrel Dickson, September 21, 2015
4 (1 page).
5 11. Respondents offered the following exhibits, which were admitted into evidence
6 at hearing:
7 Ex. 1. Email of September 22, 2015, between Conner Edwards and Holly
8 Dickson;
9 Ex. 2. Email of September 23, 2015, between Conner Edwards and Karen
10 Jensen;
11 Ex. 3. Email of September 28, 2015, between Conner Edwards and TEKS
12 Services;
13 Ex. 4. Email of September 29, 2015, between TEKS Services and Conner
14 Edwards;
15 Ex. 5. Email of September 30, 2015, between TEKS Services and Conner
16 Edwards;
17 Ex. 6. Email of September 30, 2015, between Conner Edwards and TEKS
18 Services;
19 Ex. 7. Email of September 28, 2015, between Karen Jensen and Conner
20 Edwards, updated letter to the editor;
21 Ex. 8. Email of June 20, 2016, between Conner Edwards and Chris Hurst;
22 Ex. 9. Email of June 22, 2016, between Conner Edwards and Christ Hurst;
23 Ex. 10. Audio recording of Conner Edwards deposition, "under oath";
24 Ex. 11. Audio recording of Conner Edwards deposition, "Pam driving force";
25 Ex. 12. Audio recording of Conner Edwards deposition, "Who was directing";
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1 Ex. 13. Audio recording of Conner Edwards deposition, "Doing for about three
2 years";
3 Ex. 14. Audio recording of Conner Edwards deposition, "Independent
4 expenditure group, role in independent expenditure committees";
5 Ex 15. Audio recording of Conner Edwards deposition, "Conner Edwards
6 memory not 100%";
7 Ex.16. Audio recording of Conner Edwards deposition, "Conner Edwards
8 prepared first response";
9 Ex. 17. Audio recording of Conner Edwards deposition, "Coordination";
10 Ex. 18. Audio recording of Conner Edwards deposition, "Karen Jensen knew
11 Conner Edwards helping";
12 Ex. 19. Audio recording of Conner Edwards deposition, "No decision-making
13 authority";
14 Ex. 20. Audio recording of Conner Edwards deposition, "Stand behind Hurst
15 letter";
16 Ex. 21. Philip Stutzman deposition transcript (171 pages);
17 Ex. 22. Audio recording of Conner Edwards deposition, "Reduced response,
18 whether Mr. Edwards recruited Karen Jensen";
19 Ex. 23. Audio recording of Conner Edwards deposition, "Does not know it to be
20 true Pam Roach worked directly with Karen Jensen";
21 Ex. 24. Email of October 12, 2015, between Conner Edwards and Karen Jensen;
22 and
23 Ex. 25. Declaration of Cheryl Marshall (4 pages).
24 12. The Commission heard testimony from the following witnesses: Conner
25 Edwards and Karen Jensen.
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III. FINDINGS OF FACT

After reviewing the record, including Staff Exhibits 1-43 and Respondents' Exhibits 1-25 (which were admitted into evidence), the parties' partial Stipulation as to Facts that is attached and incorporated by reference, the hearing testimony by Conner Edwards and Karen Jensen, and considering the parties' briefing and arguments at hearing, the Commission makes the following Findings of Fact and Conclusions of Law:

1. The parties agreed to the PDC's jurisdiction over this matter and the PDC laws and rules applicable to the allegations are identified in the Stipulation.

2. In 2015, Darrel Dickson, a first-term incumbent Enumclaw City Council Member, was challenged during his re-election campaign by Kim Lauk. Ms. Lauk defeated Mr. Dickson in the November 3, 2015, General Election. During his 2015 re-election campaign, Darrel Dickson reached out to then-Senator Pam Roach for advice. Upon the suggestion of Ms. Roach, Mr. Dickson agreed to have Conner Edwards, who was employed in Senator Roach's office, assist his campaign for Enumclaw City Council. Mr. Edwards assisted Mr. Dickson as an unpaid volunteer, conducting opposition research concerning Kim Lauk, among other responsibilities.

3. The evidence established that Respondents Karen Jensen and Citizens for a Better Enumclaw (CBE) financed political advertising prepared by Mr. Dickson's authorized agent, Conner Edwards. WAC 390-05-210(2). Similarly, the evidence established that Ms. Jensen made these expenditures in cooperation, consultation, concert, or collaboration with Mr. Edwards, who coordinated with Ms. Jensen on finalizing and mailing the political advertising. WAC 390-05-210(3)(a). The evidence further established that as Mr. Dickson's agent, Conner Edwards worked with Karen Jensen to send out two mailers opposing Mr. Dickson's opponent, Ms. Lauk. The evidence established that Ms. Jensen knew Mr. Edwards was working with the Dickson campaign. Those contributions exceeded the contribution limit and Ms. Jensen and CBE failed to report the expenditures as in-kind contributions.

4. On September 17, 2015, Mr. Edwards sent an email to Mr. Dickson, attaching a copy of one of the two mailers. Mr. Dickson responded to the email later that evening, stating:

Conner,
Looks great! Thank you!! I think we should order 2000 of these cards. We can have Tek starting working on this. I have to double check on the language Paid for by Concerned Citizens of Enumclaw prior to printing. Let's talk tomorrow.

Staff Ex.1, page 7.

5. The draft mailer sent by Mr. Edwards to Mr. Dickson on September 17, 2015, was virtually identical to the final mailer sent out by Ms. Jensen. The draft mailer did not include Mr. Dickson's own campaign committee, VoteDickson.org, as the sponsor but, rather, Concerned Citizens of Enumclaw, a committee registered by Mr. Dickson's father-in-law. The text of the informational side of the draft mailer reads as follows:

How will Kimberly Lauk manage YOUR tax dollars?

The way she manages her own:

Poorly

- Accrued nearly \$20,000 worth of expenses that she was unable to pay off, including a loan for a brand-new car.
- Unable to pay electricity and cable television bill.
- Declared Bankruptcy in June of 2014 to avoid wage garnishment.

Lauk can't even manage her own budget.

Don't trust her to manage Enumclaw!
Paid for by Concerned Citizens of Enumclaw

Staff Ex. 1, page 7-8.

The text of the informational side of the final version of the mailer read as follows:

How will Kimberly Lauk manage YOUR tax dollars?

The way she manages her own:

Recklessly

- Declared Bankruptcy in June of 2014 to avoid wage garnishment.
- Accrued nearly \$20,000 worth of expenses that she was unable to pay off, including a loan for a brand new car.
- Unable to pay electricity and cable television bill.

Lauk can't even manger her own budget.

Don't trust her to manage Enumclaw!

Staff Ex. 1, pages 19-20.

6. On September 21, 2015, at 12:53 a.m., Pam Roach sent an email regarding the mailers to Mr. Edwards stating, in pertinent part:

We need to get these out right away. Conner, can you come up here with copies so we can go over it? I want Darrel to truthfully be able to say he has not been too involved with this.

Staff Ex. 21, page 3.

7. On September 22, 2015, at 10:38 p.m., Mr. Dickson sent an email to Mr. Edwards stating:

I have thought a lot about the ad. I am not comfortable pursuing this advertising as part of my campaign. I have consulted with my legal advisor Rob Dickson and I am sending this email to him as well (as a witness) to confirm my decision. Please do not send me any more emails.

Staff Ex. 7.

Mr. Dickson sent this email to document a purported separation of his campaign from the mailers. In fact, he authorized Mr. Edwards to continue to work on sending the mailers through a third party rather than "as part of [his] campaign." The intent of the email was not to stop the mailing, but to distance the Dickson campaign from it and to ask Mr. Edwards to communicate by phone rather than in writing so there was no written record of their contacts. Mr. Dickson and Mr. Edwards had discussed the fact that Mr. Dickson was going to send the September 22, 2015, email.

8. Mr. Dickson and his wife Holly Dickson were friends with Karen Jensen, and they went to the same church. On September 23, 2015, at 7:02 p.m., Mr. Edwards contacted Karen Jensen by email. Staff Ex. 37. In the email, Mr. Edwards referenced "Citizens for a Better Enumclaw" and stated he understood that she had set up a PAC earlier that day to help get the word out about Kim Lauk. A draft of the proposed mailer was attached to the email, and Mr.

1 Edwards asked Ms. Jensen for her feedback. Mr. Edwards also referenced Mr. Dickson in the
2 email.

3 9. Nine minutes later, on September 23, 2015, at 7:11 p.m., Mr. Edwards sent an
4 email to Ms. Jensen and TEKS Services informing TEKS Services that the mailer would be paid
5 for by Ms. Jensen, and the sponsor should be Ms. Jensen's committee, Citizens for a Better
6 Enumclaw. Staff Ex. 28, page 4.

7 10. After September 22, 2015, during the time he was working with Ms. Jensen on
8 the mailers, Conner Edwards continued to work on the Dickson campaign. Staff Exs. 39, 40.

9 11. During the time that Mr. Edwards worked with Ms. Jensen on the mailers,
10 Ms. Jensen was aware that Mr. Edwards was a volunteer for the Dickson campaign. Her contacts
11 with Holly Dickson (Mr. Dickson's wife), Hugh Hales (Mr. Dickson's father-in-law), and Pam
12 Roach (Mr. Dickson's political colleague and Conner Edwards employer) indicate she had
13 knowledge of the campaign and its goals. The Commission finds it implausible that when Mr.
14 Jensen formed CBE with the assistance of Hugh Hales utilizing the same mailbox as his earlier
15 committee supporting Mr. Dickson, Concerned Citizens for Enumclaw, there was no knowledge
16 on Ms. Jensen's part of the tasks CBE was performing for the Dickson campaign. For example,
17 on September 24, 2015, at 2:16 p.m., Holly Dickson emailed Mr. Edwards, requesting that he
18 write a negative letter to the editor about Kim Lauk, and telling him that Karen Jensen was going
19 to sign the letter. Staff Ex. 33. On September 26, 2015, at 11:06 p.m., Mr. Edwards sent the body
20 of a negative letter to the editor to Ms. Jensen, asking her to wait until the next day to send it out
21 to allow Darrel Dickson or Holly Dickson to "intervene if I've written anything that's factually
22 inaccurate." Staff Ex. 38. The letter to the editor was later submitted to Dennis Box by Bart
23 Jensen, Ms. Jensen's husband, on September 27, 2015. Staff Ex. 25.

24 12. On September 24, 2015, Ms. Jensen registered Citizens for a Better Enumclaw
25 (CBE) with the PDC. Staff Ex. 2, page 1. Mr. Hales assisted Ms. Jensen by helping her complete
26 the committee registration form, and by allowing her to use the post office box he rented for

1 Concerned Citizens of Enumclaw, a separate political committee he registered with the PDC to
2 support Mr. Dickson's re-election campaign. Staff Ex. 2.

3 13. From September 2, 2015 through October 1, 2015, Mr. Edwards and Mr. Dickson
4 spoke numerous times on the phone. Staff Ex. 34. The phone records reflect 50 phone calls
5 between them, including approximately 12 calls after September 22, 2015.

6 14. CBE ultimately made two expenditures funded by Ms. Jensen, in the form of two
7 mailers sent out to voters in the City of Enumclaw in opposition to Kim Lauk. Staff Ex. 1,
8 pages 18-19. These expenditures included: (1) An expenditure for a direct mail piece made on
9 September 30, 2015, and mailed on October 3, 2015, that cost \$1,766.08; and (2) An expenditure
10 for a direct mail piece made and mailed on October 19, 2015, that cost \$1,040.90. The two
11 mailings cost a total of \$2,806.98. Both mailings were reported by CBE as Independent
12 Expenditure Political Advertising on Forms C-4 and C-6, and both opposed Kim Lauk. Conner
13 Edwards assisted Ms. Jensen in finalizing and mailing these mailers. The mailers included
14 Citizens for a Better Enumclaw as the sponsor. Staff Ex. 1, pages 18-19.

15 15. In her testimony, Ms. Jensen sought to explain her motivation in sending the
16 mailers. She said she was angry with Chris Hurst, the father of Ms. Lauk who was opposing
17 Darrel Dickson. The reason for the anger was that Mr. Hurst had publicly accused Mr. Dickson
18 of being too close to Ms. Jensen and her husband who he claimed were receiving special favors
19 from the City of Enumclaw. This testimony provides a logical explanation for both the Jensens'
20 and Mr. Dickson's campaign to wish to distance themselves from each other. Were the
21 expenditure publicly labeled as a contribution to Dickson's campaign, it could be taken as proof
22 of the allegation and could hurt the reputations of all. Hence the implausible notion that the
23 financing of the mailers was merely an "anti-Lauk" gesture and not to be seen as "pro-Dickson."

24 16. Conner Edwards testimony is determined to be credible and is appropriately
25 relied upon by the Commission.

26 17. Findings of fact that are deemed conclusions of law shall be so deemed.

1
2 **IV. CONCLUSIONS OF LAW**

3 1. Conner Edwards was authorized by Darrel Dickson and his campaign to act on
4 their behalf and was their agent as defined in WAC 390-05-190.

5 2. Although there is no express mandate for a knowledge element in the applicable
6 statutes, the Commission concludes that one must be implied with respect to the Respondents'
7 relationship to the "authorized agent." The Commission neither applies a strict liability
8 standard nor imposes any duty of inquiry on the Respondent. Rather, the Commission looks to
9 RCW 9A.08.010(1)(b) and WPIC 10.02. From the evidence presented, the Commission draws
10 the reasonable inference that Karen Jensen had actual knowledge of the fact that Conner
11 Edwards was an authorized agent of the Dickson campaign. Because of her awareness of
12 Conner Edwards' agency status, Karen Jensen's financing of the mailers constituted in-kind
13 contributions to the Dickson campaign.

14 3. Karen Jensen and Citizens for a Better Enumclaw violated RCW
15 42.17A.405(2) by making in-kind contributions totaling \$2,806.98 to Darrel Dickson and
16 VoteDickson.org, his 2015 Re-Election Campaign, that exceeded the \$950.00 contribution
17 limit by \$1,856.98.

18 4. Karen Jensen and Citizens for a Better Enumclaw violated RCW 42.17A.240 by
19 failing to report the expenditures as in-kind contributions.

20 5. In determining the appropriate penalty, the Commission finds that it is a
21 mitigating factor that the Respondents have not previously been found to have violated
22 RCW 42.17A or WAC 390. WAC 390-37-182(3)(a). The Commission also takes into
23 consideration that Ms. Jensen, while responsible for her actions, received bad advice and
24 guidance from those who assisted her in preparing and sending out the mailers. The penalty
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1 imposed is also consistent with penalties imposed in prior cases considered by the Commission.
2 WAC 390-37-182(3)(o).

3
4 **V. ORDER**

5 1. Karen Jensen and Citizens for a Better Enumclaw are hereby ordered to pay a
6 total civil penalty of \$2,000, with \$1,000 of that amount suspended based on the following
7 conditions:

8 a. The Respondents are not found to have committed any further violations
9 of RCW 42.17A or WAC 390 within four years of the date of the Final Order in
10 this matter. The suspended penalty shall not be assessed based solely upon any
11 remediable violation, minor violation, or error classified by the commission as
12 appropriate to address by a technical correction.

13 b. The Respondents are in compliance with all reporting requirements.

14 c. The non-suspended portion of the penalty (\$1,000) is paid within thirty
15 days of the date of the Final Order in this matter.

16
17 2. If the Respondents fail to comply with any of the conditions of this Order, the
18 suspended portion of the penalty shall immediately become due without further action by the
19 Commission.

20
21 SO ORDERED this 26 day of September, 2019.

22 WASHINGTON STATE PUBLIC
23 DISCLOSURE COMMISSION

24 FOR THE COMMISSION:

25 

26 William Downing, Presiding Officer
Commissioner, Public Disclosure Commission

Copy of this Order mailed and/or emailed to:

John White, Attorney for Karen Jensen and Citizens for a Better Enumclaw
(white@livengoodlaw.com)

Philip E. Stutzman, PDC Staff, Sr. Compliance Officer (Phil.Stutzman@PDC.wa.gov);

Chad Standifer, Assistant Attorney General, Counsel for PDC Staff (ChadS@atg.wa.gov).

I, <u>Philip E. Stutzman</u> , certify that I mailed <u>electronically</u> copy of this order to the Respondent postage pre-paid on the date stated herein.	
<u>Philip E. Stutzman</u> Signed	<u>9/27/2019</u> Date

NOTICE: RECONSIDERATION

PURSUANT TO THE PROVISIONS OF RCW 34.05.470 AND WAC 390-37-150, YOU MAY FILE A PETITION FOR RECONSIDERATION WITH THE PDC WITHIN TEN (10) DAYS FROM THE DATE THIS FINAL ORDER IS SERVED UPON YOU. ANY REQUEST FOR RECONSIDERATION MUST STATE THE SPECIFIC GROUNDS FOR THE RELIEF REQUESTED. PETITIONS MUST BE DELIVERED OR MAILED TO THE WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION, 711 CAPITOL WAY, ROOM 206, BOX 40908, OLYMPIA WA 98504-0908.

NOTICE: PETITION FOR JUDICIAL REVIEW

YOU HAVE THE RIGHT TO APPEAL THIS FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542. ANY PETITION FOR JUDICIAL REVIEW OF THIS FINAL ORDER MUST BE FILED WITH THE COURT AND ALSO SERVED UPON BOTH THE COMMISSION AND THE OFFICE OF THE ATTORNEY GENERAL WITHIN THIRTY (30) DAYS AFTER THE DATE THIS FINAL ORDER IS SERVED UPON YOU.