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State of Washington

PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission Statement of Understanding

Unite Here Local 8 PAC: PDC Case 55345

I Stefan Moritz, as an Officer of, and on behalf of, UNITE Here Local 8 PAC,
(PAC Officer's Name) hereby acknowledge violating the following:

1. RCW 42.17A.205(5) by failing to include the sponsor's name in the Committee name on an amended or updated Registration Statement filed by a political committee within 60 days of an election.
2. RCW 42.17A.240 by failing to timely provide the required expenditure details on Summary Full Campaign Contribution and Expenditure Reports (C-4 reports) for a continuing political committee, including the required sub-vendor breakdown for independent expenditure advertisements or electioneering communications undertaken by a political committee during the reporting period.
 - For calendar year 2019, Unite Here Local 8 PAC (Committee) disclosed receiving \$460,123 in total contributions from Unite Here TIP State & Local Fund out of New York, \$60,000 from Unite Here Local 8, and \$920.05 in Miscellaneous receipts. Between January 1 to July 8, 2019, the Committee had no contribution or expenditure activities.
 - Prior to the August 6, 2019 primary election, the Committee received a \$150,000 contribution on July 9, 2019, from Unite Here TIP State & Local Fund, New York. The Committee also disclosed receiving: (1) A \$7,000 contribution from Unite Here Local 8 on July 31, 2019; (2) a \$200,000 contribution from Unite Here TIP State & Local Fund on September 23, 2019; (3) a \$110,123 contribution from Unite Here TIP State & Local Fund on October 11, 2019; and (4) a \$53,000 contribution from Unite Here Local 8 on October 11, 2019.
 - More than 80 per cent of the Committee's contributions were received from Unite Here TIP State & Local Fund during the 2019 election cycle.

- The Committee was required to amend the Registration no later than September 7, 2019, to include Unite Here TIP State & Local Fund as the sponsor for the 2019 election cycle. The Committee failed to amend the Registration and no sponsor information was added to the Committee name.

RCW 42.17A.240 requires political committees to accurately disclose all contribution and expenditure information on the C-4 reports and to provide a detailed description for all expenditures made, including the sub-vendor's name, whether an expenditure was an independent expenditure or electioneering communication, the names of the candidate(s) supported or opposed by the advertisements, and description of the services such as the number of mail pieces printed and mailed, or advertisements aired dates.

- On July 16, 2019, the Committee timely filed the 21-Day Pre-Primary Election C-4 report disclosing \$150,588.55 in monetary contributions received, and \$150,000 in expenditures made. The C-4 report disclosed one expenditure totaling \$150,000 that was made to Print Logistics from Sacramento, CA, to design, produce and broadcast independent expenditures in support of Andrew Lewis, a 2019 candidate for Seattle City Council, Position 7.
- On September 18, 2019, the Committee filed an amended 21-Day Pre-Primary Election C-4 report listing the same \$150,588.55 in monetary contributions received and \$150,000 in expenditures made, but the amended information listed seven independent expenditures made to Print Logistics, all on July 11, 2019 and in support of Andrew Lewis.
- The new expenditures disclosed included: (1) a \$108,610 independent expenditure made to Comcast Spotlight for a Cable TV ad buy that aired 7/16 to 8/6/2019, and a \$16,000 independent expenditure was made to KIRO TV for a TV ad buy that aired 7/21 to 7/28/2019; (2) a \$12,330 expenditure made by the Committee to Print Logistics for the design and production work on the advertisements; (3) a \$5,483 expenditure made to Google for video ads that appeared 7/15 through 8/6/2019; (4) a \$4,077 expenditure made to Facebook for video ads that appeared 7/12 through 7/19/2019; and (5) a \$2,780 expenditure made to the Seattle Time for online banner ads that ran during 7/15 through 8/6/2019.
- The amended independent expenditure information filed by the Committee for the advertisements made in support of Andrew Lewis for Seattle City Council were disclosed 64 days late.

- In addition, the amended information was disclosed 43 days after the August 6, 2019 primary election was held.

Unite Here Local 8 PAC would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing) being scheduled by Public Disclosure Commission (PDC) staff. Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, Unite Here Local 8 PAC is completing this Statement of Understanding, and enclosing a check or money order in the amount of \$300 as a penalty payment to resolve this matter.

The \$300 penalty assessed against Unite Here Local 8 PAC includes: (1) a \$150 penalty for the acknowledged violation of RCW 42.17A.205, for failing to timely amend the Committee Registration to include Unite Here TIP State & Local Fund as the sponsor; and (2) a \$150 penalty for the acknowledged violation of RCW 42.17A.240 for failing to accurately disclose the required expenditure details on the 21-Day Pre-Primary Election C-4 report for the independent expenditure or electioneering communication advertisements.

The \$300 penalty is being assessed in accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143. Unite Here Local 8 PAC understands that by completing this Statement of Understanding, Unite Here Local 8 PAC is acknowledging violations of Chapter 42.17A RCW and Title 390 WAC as set forth above and waiving its right to a hearing in this matter.

Unite Here Local 8 PAC further understands that this will resolve the issues of failing to timely amend the Committee Registration to include the sponsor's name, and failing to accurately disclose the required expenditure details on the 21-Day Pre-Primary Election C-4 report, as described above.



Officer/Treasurer for Unite Here Local 8

03/24/2021

Date Signed

Please make your check or money order payable to the **"Washington State Treasurer"** and be sure to include the PDC Case number in the memorandum field, and mail or deliver this Statement of Understanding along with your payment to:

Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908



Public Disclosure Commission
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