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PUBLIC DISCLOSURE COMMISSION

State of Washington

**PUBLIC DISCLOSURE COMMISSION**

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**Public Disclosure Commission Statement of Understanding  
Waste Treatment Completion Company: PDC Case 55698**

I, Sandra B Fowler, General Counsel WCCC, hereby acknowledge that:  
(Printed Name and Title of Waste Treatment Completion Company Official)

During the period March-May 2019, Waste Treatment Completion Company (WTCC) violated RCW 42.17A.495 and WAC 390-17-100 by deducting employees' wages for political contributions to Plumbers & Steamfitters Local 598 PAC (Local 598 PAC), the political committee operated by United Association of Plumbers and Pipefitters Local 598 (Local 598), without first obtaining authorizations that comply with RCW 42.17A.495 and WAC 390-17-100.

On June 6, 2019, the Freedom Foundation requested to inspect the PAC deduction authorization forms for WTCC employees listed as contributors to Local 598's PAC in March, April, and/or May 2019. During this period, WTCC withheld at least \$47,293.13 from hundreds of its employees' wages, resulting in 744 contributions to Local 598 PAC. In response to the Freedom Foundation's request, WTCC produced nine valid dispatch/authorization forms. WTCC was unable to produce authorization forms for five contributions. Forms for 371 contributions were identified as non-complaint for various reasons.

Waste Treatment Completion Company has now obtained compliant authorization forms for all employees continuing to make political contributions through payroll deduction.

Waste Treatment Completion Company 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, Waste Treatment Completion Company is completing this Statement of Understanding and enclosing a check or money order in the amount of \$500 as a penalty payment to resolve this matter.

Waste Treatment Completion Company understands that by completing this Statement of Understanding, Waste Treatment Completion Company is acknowledging the violation of RCW 42.17A set forth above, and is waiving its right to a hearing in this matter.

Waste Treatment Completion Company  
Statement of Understanding  
PDC Case 55698  
Page 2

Waste Treatment Completion Company further understands that this will resolve the issue of Waste Treatment Completion Company failing to obtain compliant authorizations before deducting wages or salaries for political contributions from March 2019 to the present date.

/s/ Sandra B Fowler  
(Signature of WTCC Official)

2 Feb 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/check to the PDC at the following address:

**Public Disclosure Commission  
PO Box 40908  
711 Capitol Way, Room 206  
Olympia, WA 98504-0908**