



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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October 14, 2020

Delivered electronically to:

Valerie Walker at [valerie@pfrwa.com](mailto:valerie@pfrwa.com)

Lance Andree at [lance@pfrwa.com](mailto:lance@pfrwa.com)

Centralia School District  
Centralia School District Officials  
c/o Valerie Walker and Lance Andree  
Porter Foster Rorick LLP  
601 Union Street, Suite 800  
Seattle, WA 98101

Subject: Complaint Filed by Dan Sullivan, PDC Case 66039

Dear Valerie and Lance:

After a careful review of the alleged violations and relevant facts, the PDC has dismissed the complaint against Centralia School District and Centralia School District Officials. Enclosed is a copy of the dismissal letter sent to Mr. Sullivan.

PDC staff is reminding you about the importance of keeping all District-produced material concerning ballot propositions fair and objective, by refraining from using writing styles with a promotional appearance or tone (e.g. by using exclamation marks in phrases like, "Levies support technology!" or "Your EP&O levy helps create pathways to career and college success after graduation. Learn more about how your levy supports learning in Centralia!" or by using promotional phrases such as "LEVIES ARE FOR LEARNING.") The District has a responsibility to provide needed information, but is prohibited from using its facilities and resources to promote the ballot measure.

PDC staff expects in the future that you will keep all material fair and objective, and will refrain from producing material with promotional styles or phrases, in accordance with PDC laws and rules. Also, remember, if the District reminds citizens to vote, they must do so for all elections, not just for school district elections.

In addition, pursuant to WAC 390-37-060(1)(d), this letter constitutes a formal written warning to Centralia School District concerning its failure to obtain *proper* written requests from employees *before* withholding wages or salaries for contributions to Citizens for Centralia Schools, in accordance with RCW 42.17A.495 and WAC 390-17-100.

Staff is aware the District has canceled all political committee authorizations effective May 31, 2020, and will not process further payroll deductions for contributions to Citizens for Centralia Schools unless the District receives authorization forms fully compliant with RCW 42.17A.495 and WAC 390-17-100.

Staff expects Centralia School District to be fully compliant going forward with RCW 42.17A.495 and WAC 390-17-100, by having proper written authorizations in hand *before* withholding wages or salaries for contributions to a political committee or candidate committee, and WAC 390-17-110, by providing such employees with the required annual notification of withholding provisions. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Because staff's investigation did not find evidence Centralia School District officials used facilities of the District for the purpose of promoting its February 11, 2020 ballot proposition, in violation of RCW 42.17A.555, I am dismissing that allegation in accordance with WAC 390-37-070.

If you have questions, you may contact Phil Stutzman, Compliance Officer, at 360-753-1111; toll-free at 877-601-2828; or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

*Electronically Signed Peter Frey Lavallee*

Peter Frey Lavallee  
Executive Director