

Complaint Description

Dan Sullivan (Mon, 2 Mar 2020 at 8:27 AM)

VIOLATION ONE is that the Centralia School District has been extensively spending public funds to affect the February 11 levy election.

1A Staff time. Centralia School District's Public Relations & Communications Coordinator has been working daily for two months generating content, taking campaign photographs, writing and posting Facebook posts, creating blog entries, designing at least one patron mailing, preparing several district parent mailings, producing a video, creating visual images, designing and distributing literature, setting up a community meeting, sending a dozen email alerts about the levy election, preparing and deploying district robo-calls about the levy election, setting up and marketing a student mock election, and communications with reporters on behalf of a ballot measure's passage. Exhibits 1-4.

1B Staff time arranging a mailing for the Citizens for Centralia Schools campaign. Centralia public relations staffer, Petersen, is also a member of the campaign committee. He is responsible for the preparation of exhibit 4, a school district mailing. A near identical mailing (exhibit 5) using the same printer and mailhouse was prepared for the campaign committee. The allegation is that CSD staff time, computer and art was prepared for the campaign.

1C Mailing Feb 1. Centralia School District's PR Coordinator sent a mailing to all households in the area. This mailing was coordinated with the campaign and was sent within 14 days of the election. The content of one known mailing is exhibit 4. There could be others.

1D electioneering communication using students as couriers. Since November, reportedly several mailings were sent to families about the levy using students as couriers to carry these election-affecting messages.

1E electioneering email messages using the district directory. Since November, reportedly several email messages were sent to families using the school district's family directory. Exhibit 2 is one such example discussing turning in ballots and how the district will collect ballots from patrons.

VIOLATION TWO is that the Centralia School District is collecting political donations and transferring them to the Citizens for Centralia Schools as payroll deductions or otherwise without written authorization, without notifying employees having funds withheld of their right to revoke, and without maintaining records of such authorization in violation of RCW 42.17A.495.

Citizens for Centralia Schools is sporadically reporting PAC receiving funds and making expenditures to affect elections. See exhibits 5 and 6.

March 2 Addendum:

VIOLATION THREE Centralia School District solicited funds for Citizens for Centralia Schools campaign in violation of RCW 41.06.250

A payroll deduction solicitation was delivered to all employees district-controlled internal mailboxes during the week of February 24.

Only the district manages what is put in these boxes, and employees felt pressured to fund an election campaign as part of their employment.

Public entities soliciting campaign donations violates RCW 41.06.250 which states:
Political activities.

(1) Solicitation for or payment to any partisan, political organization or for any partisan, political purpose of any compulsory assessment or involuntary contribution is prohibited: PROVIDED, HOWEVER, That officers of employee associations shall not be prohibited from soliciting dues or contributions from members of their associations. No person shall solicit on state property or property of a political subdivision of this state any contribution to be used for partisan, political purposes.

As an order for a remedy, the Public Disclosure Commission should order the Centralia School District to end all payroll deductions on behalf of this political action committee.

What impact does the alleged violation(s) have on the public?

Citizens pay levies to the school district, and should not have these used to advocate in mailings, on purchased facebook advertising and with extensive staff time to promote the passage of a ballot measure. Tax-funded electioneering is harmful to democracy.

Employees should have payroll deductions safeguarded from unaccountable withholding. Their consent is a form of protection against unwanted deductions. Their annual notification allows consideration of whether the PAC continues to work as they desire or even exists at all officially.

Taxpayers should not subsidize campaign solicitations, and public employees should not be pressured to contribute to district-favored election causes.

List of attached evidence or contact information where evidence may be found.

March 2 Addendum, evidence that PAC solicitations were made on public property using district resources.

Exhibit 1, website indicating a host of district outreach efforts to pass the levy

Exhibit 2, CSD email message example of electioneering

Exhibit 2b offers additional email communications regarding the levy

Exhibit 3, CSD purchased Facebook advertisements near the election

Exhibit 4, Centralia SD all-households mailing

Exhibit 5, Citizens for Centralia Schools Campaign all mailbox mailing.

Exhibit 6, Citizens for Centralia Schools sign purchases.

List of potential witnesses with contact information to reach them.

Centralia School District
Ed Petersen, Public Relations & Communications Coordinator
Mark Davalos, Superintendent
2320 Borst Ave.
PO Box 610
Centralia, WA 98531
epetersen@centralia.wednet.edu
360-827-6375
360-330-7600

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

RECEIVED
FEB 04 2020
Public Disclosure Commission

February 3, 2020

Dan Sullivan
906 S. Buckner
Centralia, WA 98531

(360) 388-0594

Public Disclosure Commission:

I would like to file a format complaint about the Centralia School District's use of public facilities to affect an election.

Respondent name:

Centralia School District
Ed Petersen, Public Relations & Communications Coordinator
Mark Davalos, Superintendent
2320 Borst Ave.
PO Box 610
Centralia, WA 98531
epetersen@centralia.wednet.edu
360-827-6375
360-330-7600

Sections of Law violated

RCW 42.17A.555 Use of public office or agency facilities in campaigns
RCW 42.17A.495 Withholding of employee wages for contributions without written authorization, without notifying of the right to revoke, and without maintaining records of such authorization.

What impact does the alleged violation(s) have on the public?

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Citizens for Centralia Schools is sporadically reporting PAC receiving funds and making expenditures to affect elections. See exhibits 5 and 6.

I or declare under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



Dan Sullivan, February 3, 2020

March 2 Addendum:

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As an order for a remedy, the Public Disclosure Commission should order the Centralia School District to end all payroll deductions on behalf of this political action committee.

Payroll Deduction Form - Citizens for Centralia Schools

I authorize Centralia School District to automatically deduct the amount indicated below from each paycheck for Citizens for Centralia Schools. I understand this deduction will continue until I notify payroll of my wish to end it. Citizens for Centralia Schools support district levy, bond, and other elections through grassroots activities. Donated funds are used for signs, mailings, and other advertisements. They do not have a paid staff.

\$5 \$10 \$15 Other: _____

Signature: _____ Date: _____

Printed Name: _____

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\$5 \$10 \$15 Other: _____

Signature: _____ Date: _____

Printed Name: _____

Exhibit 1, website indicating a host of district outreach efforts to pass the levy

Levies are for Learning!

Replacement Levy 2020
Posted by Centralia School District 401
2,566 Views

Our Board of Directors has approved a replacement levy election for the February 11, 2020 ballot ([click here to read the full resolution](#)). The current levy expires at the end of 2020. Here are some important facts:

- The levy rate is increasing to \$2.50 per \$1,000 in assessed property value. (The district's bond rate will fall to \$1.65 per \$1,000, resulting in a net tax increase of 45 cents per \$1,000, possibly less). This is lower than the 7-year average of \$2.66
- The replacement levy will generate about \$6.6 million in local revenue in 2021.
- Levy funds cannot be used for basic education. They may only be used for enhancements beyond what the state's basic education funding model provides.

- **This is not a new tax, this is a replacement of the current levy which expires in 2020.**
- Levy funds impact nearly every program in our district from athletics to academics. We are able to provide full-time school counselors, nursing staff, athletic options, extended learning programs, additional classroom support and much more because of levy funds.
- Our levy helps us keep class sizes comparatively low. Our levy helps us provide behavioral support in our schools.
- Our levy helps purchase, maintain, and replace important classroom technology resources.
- **SENIOR EXEMPTION: If you are 61 years old or older, with disposable household income under \$40,000 per year, you may qualify for an exemption from this tax. Please contact the Lewis County Auditor at (360)740-1392**

Washington’s education funding model leaves a gap between what the state funds for education and what our students in Centralia need for success. Local school levies are voter-approved sources of funding that are on the ballot every 2-4 years. We collect local levy revenue through a tax on properties in our school district boundaries. The current rate per \$1,000 in property value is \$1.50, which was the current legal maximum for our district during the last election cycle.

Voters approved the current CSD Enhancements & Operations levy in February 2018. The state has raised the limit on local levies to \$2.50 per \$1,000 in property value, however the district receives no additional funding unless voters approve a new levy at a higher rate.

Frequently Asked Questions

Is this a new tax?

No. Centralia property owners have been paying local school levy taxes for more than 45 years.

Why do we vote on levies so frequently?

Local school levies expire. The duration of a levy generally most commonly ranges from two to four years. School districts ask voters

to renew their levies as they approach their expiration date.

When does the current EP&O levy expire?

At the end of 2020.

How much will the replacement levy cost?

The rate of the proposed replacement levy is \$2.50 per \$1,000 in assessed value. The median home value in Centralia is \$197,500. The levy tax for a home at the median value will be \$493.75 per year, or about \$41.15 per month.

What do levy funds pay for?

Levy funds can only be used for enhancement and programs that are *not* defined as basic education. This includes (but is not limited to):

- o Special Education
- o Additional staff (such as counselors, additional teachers to reduce class sizes, paraeducators, etc.)
- o Athletics
- o Music and arts programs
- o Facility Maintenance
- o Student transportation
- o Staff professional development
- o Food service
- o Technology purchases, maintenance, and replacement

How much of the district's annual budget is made up of levy funds?

In the current school year, about 6.6% of our budget is EP&O levy funds.

Where can I learn more about the current and historical taxes for my property?

The **Lewis County Assessor's office** offers a parcel search service where you can find this information.

Didn't the McCleary ruling and subsequent legislation "fully fund" education?

No. The McCleary ruling only involved the way the state funds basic education. It did not impact special education or anything else not defined as basic education.

I'm a senior citizen or disabled. Do I have to pay this tax?

Certain senior citizens or disabled persons may qualify for an exemption from school levy taxes. Please contact the **Lewis County Assessor's office**.

Our current EP&O levy is \$1.50 per \$1,000. Why is it going up?

State legislation in 2017 forced districts to lower their local levy rates. The impact of that legislation left districts struggling to continue to provide levy-funded programs and services their voters asked for. From 2013 through the current year, our average levy rate per \$1,000 in Centralia has been \$2.66.

In 2019, the legislature took action to remedy the situation caused by their McCleary fix. Districts can now seek local levies at a rate of \$2.50 per \$1,000 in assessed value. Our Board of Directors deliberated carefully before deciding to seek a replacement levy that restores funding for important programs and services in our district.

Please email additional questions to levyquestions@centraliaschools.org or call 360-330-7600.





CENTRALIA SCHOOL DISTRICT

Replacement Levy

February 11, 2020 Replacement Levy Election Fact Sheet

Centralia School District is asking voters to approve a replacement of our current Educational Programs & Operations (EP&O) levy, which expires at the end of 2020. The EP&O levy helps us reach strategic goals that are set by our Board of Directors and our community. Those goals include helping students thrive in the classroom and graduate college and career ready.

What is the EP&O levy? What does the funding do? How much will it cost?

The replacement levy is **NOT A NEW TAX**.
The replacement EP&O levy will cost \$2.50 per \$1,000 in assessed value. **This rate is lower** than the \$2.66 average rate of Centralia School District levies approved by voters since 2013.

The EP&O levy:

◆ Funds programs that put our students on pathways to career & college success.

🚌 Helps fund student transportation, including a study of a two-tiered bus system to separate elementary students from older riders.

👩‍🏫 Provides support for athletics, paraeducators, nurses, arts programs, and additional staffing for every school. The EP&O levy also helps keep class sizes comparatively low and funds behavioral support staff and academic coaches.

🍽️ Ensures that every student receives a nutritious lunch or breakfast every school day *regardless of* financial standing.

Learn more about how you learning at

LEVIES ARE FOR LEARNING

Centralia has a long history of showing support for education. Voters have approved levies (formerly known as Maintenance and Operations Levies) consistently for more than 45 years.

Our Board of Directors deliberated thoughtfully and cautiously when considering the rate for the replacement EP&O levy. The \$2.50 rate is necessary to maintain services and to accomplish goals set by our community, such as two-tiered busing systems.

The tax rate of our construction bond will fall to \$1.65 in 2021, from the current \$2.20. This reduction means the net increase with the replacement EP&O levy will be 45 cents per \$1,000 in assessed value.

The average levy rate in Centralia since 2013 is \$2.66 per \$1,000

\$2.50 per \$1,000 in assessed value
(\$625 per year for a home valued at \$250,000)

Property owners age 65 or older with fixed income under \$40,000 per year can be exempt from this tax. Contact the Lewis County Assessor's Office.

REMEMBER TO VOTE FEBRUARY 11, 2020

Independent Mark Davalos
20 Borst Ave.
Centralia, WA 98531

If you are having trouble viewing the document, you may [download the document](#).

Download any of our levy informational materials by clicking on the file name.

 **Superintendent Letter to Parents**

Letter from superintendent Mark Davalos sent home with elementary students in December, 2019.

 **Levy Questions Graphic**

Graphic advising where to email questions about the EP&O levy

 **Levy Technology Poster**

11x14 poster showing how the EP&O levy supports technology in our district

 **Electronic Readerboard Video**

Brief video formatted for the district office electronic readerboard

 **Basic Info Slide**

Basic information about the EP&O levy

 **Levy Pool Poster**

11x14 poster showing how the EP&O levy helps support student-focused activities at the Centralia Community Indoor Pool

 **7-year Average Levy Rate Slide**

Chart showing the rate per \$1,000 of our Centralia School District levies over a 7 year period.

Replacement EP&O Levy Questions

* Required

Please send us your questions about the Replacement EP&O levy. We will respond as soon as possible! *

Your answer

Please enter a valid email address so that we can respond. *

Your answer

Submit

Never submit passwords through Google Forms.

This form was
created inside of
Centralia School
District 401.

...

Google Forms

Register to Vote!

You must be legally registered to vote in a school levy election. Washington State makes it easy to register online, by mail, or in person (at a county elections office). [Click here to register to vote...](#)

Levy 2020 Headlines

OSPI APPROVES CSD LEVY EXPENDITURE PLAN

[READ MORE](#)

BOARD SETS RATE FOR RENEWAL LEVY

Replacement levy will appear on the February 11, 2020 ballot.

[READ MORE](#)

Exhibit 2, CSD email message example of electioneering

From: Centralia School District <publicrelations@centralia.wednet.edu>
Subject: CSD Levy Update - Important Information
Date: January 27, 2020 at 9:18:30 AM PST
To: Centralia School District 401 Recipients <recipients@centralia401.parentlink.net>
Reply-To: Centralia School District <publicrelations@centralia.wednet.edu>

EP&O Levy Update

Ballots are out, make sure you send them back!

Ballots have arrived in local mailboxes for the February 11, 2020 election. Voting is an important responsibility in civil society. Please take a few minutes to mark your ballot and send it back. Mailing is free, just drop it in any outgoing mailbox.

We will also have ballot boxes in our school offices. You can check online to ensure your ballot was delivered and counted ([click here](#), login, then click 'my ballot').

If you are not registered to vote, you can still register through election day! Contact the [Lewis County Auditor](#).

[Click here to learn more about your EP&O replacement levy.](#)

The video below was shown to students in a mock election. It contains information about the levy.

Please email questions to levyquestions@centralia.wednet.edu or call 360-330-7600.

Mock Election Video



Centralia School District

[Facebook](#) [@centralia_sd](#)

Centralia School District does not discriminate in any programs or activities on the basis of sex, race, creed, religion, color, national origin, age, veteran or military status, sexual orientation, gender expression or identity, disability, or the use of a trained dog guide or service animal and provides equal access to the Boy Scouts and other designated youth groups. The following employees have been designated to handle questions and complaints of alleged discrimination: Civil Rights Coordinator & Title IX Coordinator: Tabitha Whiting (twhiting@centralia.wednet.edu); and Section 504 Coordinator: Tammy Jensen-Tabor, (jensen-tabor@centralia.wednet.edu) (360) 330-7600, 2320 Borst Avenue, Centralia, WA 98531-0610.

2320 Borst Avenue, Centralia, WA 98531-0610
360-330-7600
publicrelations@centralia.wednet.edu
CentraliaSchools.org

Exhibit 2b offers additional email communications regarding the levy

From: Centralia School District <publicrelations@centralia.wednet.edu>
Subject: Ballots are out!
Date: January 26, 2020 at 7:26:58 PM PST
To: Centralia School District 401 Recipients <recipients@centralia401.parentlink.net>
Reply-To: Centralia School District <publicrelations@centralia.wednet.edu>

Hello families!

Ballots have arrived in mailboxes! Voting is an important part of civil society. We encourage everyone to take a couple of minutes to fill out your ballot and return it. Postage is free on Washington state ballots.

Visit www.CentraliaSchools.org/levies if you have questions about the replacement EP&O levy, or email levyquestions@centralia.wednet.edu.

-Centralia School District-
www.CentraliaSchools.org
360.330.7600

You are receiving this email because of your relationship with Centralia School District 401. If you wish to stop receiving email updates sent through the Blackboard service, please [unsubscribe](#).
Centralia School District 401 | 2320 Borst Ave PO Box 610, Centralia, WA 98531 | 360-330-7600

From: Josue Lowe <jlowe@centralia.wednet.edu>
Subject: Student & Family Weekly Update - February 3, 2020
Date: February 2, 2020 at 7:30:02 PM PST
To: Centralia High School Recipients <recipients@centralia401.parentlink.net>
Reply-To: Josue Lowe <jlowe@centralia.wednet.edu>

Centralia HS
Student & Family Update - February 3, 2020

Who We Are at Centralia HS

In all that we do, we ask ourselves how it fits into the following statements;

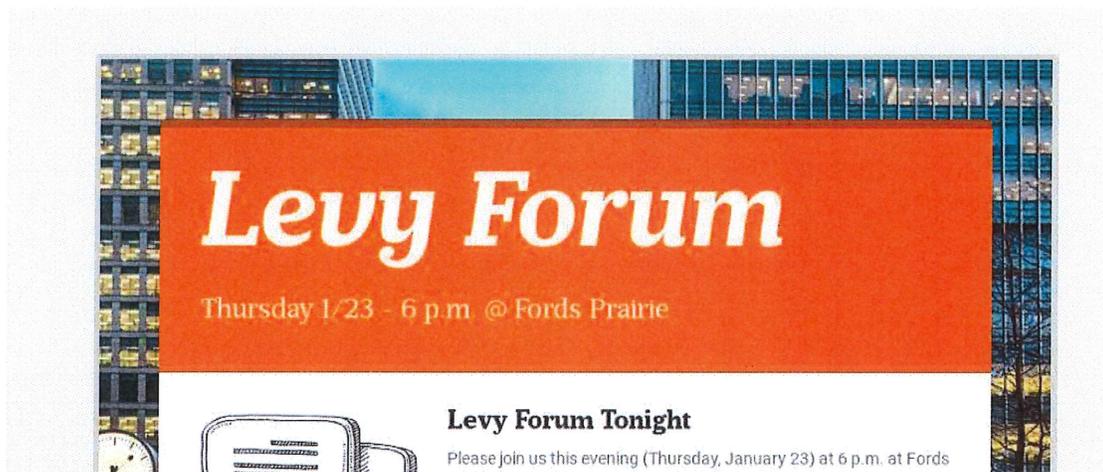
Levies are for Learning

Ballots for the February 11, 2020 election will arrive at your homes very soon. Centralia School District is asking voters to consider a proposition to renew our Educational Programs & Operations Levy (EP & O), which expires at the end of the year. The district is asking for levy rate of \$2.50 per \$1,000 in assessed value for two years. This is lower than our average levy rate over the past 7 years.

Our EP&O levy provides funds important programs and services here at (insert school name). Here are some examples of how the levy supports students in Centralia:

- Athletics
- Transportation (the replacement levy will allow our district to improve transportation technology and move toward separating elementary students from older bus riders on separate routes).
- Food service (every student in Centralia can receive lunch and breakfast at no charge).
- Technology (purchase and replacement of technology items like Chromebooks).
- Additional teachers and paraeducators to keep class sizes low and students on-track.
- Behavioral support staff.
- Music and arts programs.
- Career and technical education.
- Special education.

From: Centralia School District <publicrelations@centralia.wednet.edu>
Subject: Levy Forum TONIGHT
Date: January 23, 2020 at 4:30:04 PM PST
To: Centralia School District 401 Recipients <recipients@centralia401.parentlink.net>
Reply-To: Centralia School District <publicrelations@centralia.wednet.edu>



From: Josue Lowe <jlowe@centralia.wednet.edu>
Subject: Student & Family Weekly Update - January 27, 2020
Date: January 27, 2020 at 2:50:11 PM PST
To: Centralia High School Recipients <recipients@centralia401.parentlink.net>
Reply-To: Josue Lowe <jlowe@centralia.wednet.edu>



From: Centralia School District <publicrelations@centralia.wednet.edu>
Subject: CSD QuickNews - January 31, 2020
Date: January 31, 2020 at 1:38:39 PM PST
To: Centralia School District 401 Recipients <recipients@centralia401.parentlink.net>
Reply-To: Centralia School District <publicrelations@centralia.wednet.edu>





Remember to Vote!

Have you mailed your ballot back for the 2020 election yet? Our district encourages all eligible citizens of our district to participate in the election process. The renewal of our EP&O levy is on this ballot. The replacement levy will provide approximately \$6.5 million in annual local revenue for programs and services that are not funded or fully funded by the state. Including:

- **Career and Technical Education** - creating pathways to post graduation employment success.
- **Technology** - More than 2,000 Chromebook computers require replacement within two years.
- **Transportation** - More than 70% of Centralians want drastic changes to busing, including separation of elementary and older students on individual routes. The replacement EP&O levy will help make this happen.
- **Food Service** - Learning is impossible when you're worried about when your next meal might be. Every student in Centralia

Centralia School District

Replacement Educational Programs & Operations Levy

February 11, 2020 Special Election





Your Educational Programs & Operations Levy (EP&O) helps fill state funding gaps, including:

- Athletics
- Special Education
- Music & Arts Programs
- Transportation
- Food Services
- Additional teaching/support staff
- Technology purchases/replacement
- Staff professional development
- Career & Technical Education
- and much more...

NOT A NEW TAX

Centralia School District is seeking the replacement of the current levy, which expires in 2020.

The EP&O levy helps fund programs and services that are not fully funded by the state. Levies require a simple majority for passage.

\$2.50 per \$1,000 in assessed value for two years.

2021: \$6.5 million
2022: \$6.6 million

Low-income senior citizens may be exempt from this tax. Contact the Lewis County Assessor.

To: Centralia School District 401 Recipients <recipients@centralia401.parentlink.net>

Reply-To: Centralia School District <publicrelations@centralia.wednet.edu>

CSD QuickNews

January 24, 2020



School Board Appreciation

January is School Board Appreciation month! Please join us in thanking our Board of Directors for their hard work! They put in a lot of volunteer hours every month to keep our schools moving.

- Lori Fast
- Amy Buzzard
- Vickie Jackson
- Mandi McDonnell



Ballots Arriving - Remember to Vote!

If you haven't already received your ballot for the February 11 special election, you will soon. Our replacement EP&O levy will be on it! It only takes a few minutes to fill out your ballot and place it in a mailbox. Please remember to vote!

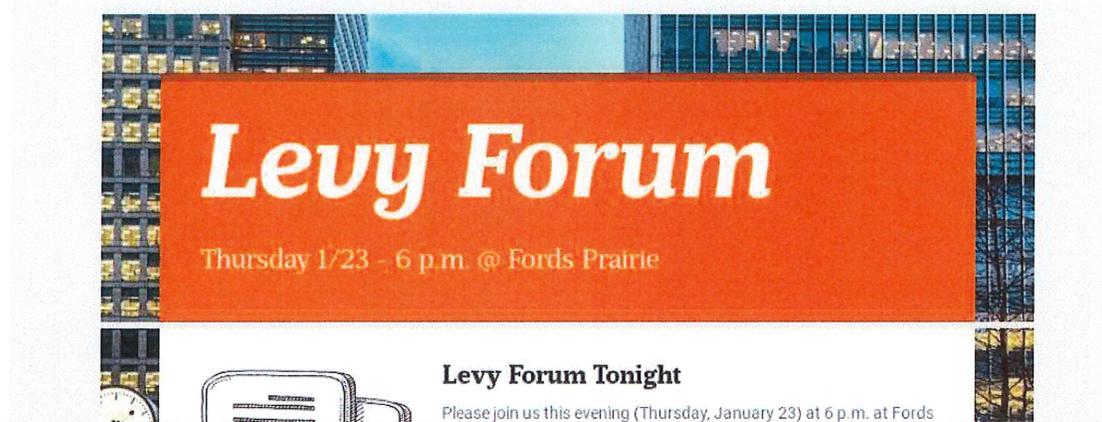
[Click here for information about the replacement EP&O Levy](#)

We will have special ballot boxes at each school office where you can deposit your ballot if you choose. We hand them over to the auditor's office personally. You can check online to ensure your ballot was delivered and counted.

If you are not registered to vote, you can register right up to election day. The staff at the [Lewis County Auditor's](#) office will be happy to help!

Fifth Grade Leads Book Drive

From: Centralia School District <publicrelations@centralia.wednet.edu>
Subject: Community Levy Forum Tonight at 6 p.m.
Date: January 23, 2020 at 8:43:12 AM PST
To: Centralia School District 401 Recipients <recipients@centralia401.parentlink.net>
Reply-To: Centralia School District <publicrelations@centralia.wednet.edu>

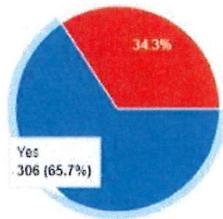


January 16, 2020



Superintendent Search Application Window Closes

The application window has closed for Centralia's search for our next superintendent. Our Board of Directors will review applications on January 22nd and the first round of interviews will be held on January 28th. The date for the finalist interview is yet to-be-determined.



Mock Levy Election Held for Students

High school, middle school, and 6th grade students were given an opportunity to participate in a mock levy election this week. Classes watched a short video presentation about the levy and then read the language that will appear on the actual February 11 ballot before casting their votes.

As of the publication of this newsletter, 65.7% of participating students voted "yes" in the hypothetical election.

CSD QuickNews

January 3, 2020

Small Equipment Fire at CHS

Centralia High School was briefly evacuated on Friday after a brand-new milk cooler caught on fire. The incident occurred in a temporary food service area in the school's entry hall.

Students and staff did a great job of evacuating the school quickly and safely, and Riverside Fire arrived minutes after the call was made. The malfunctioning cooler was quickly extinguished and removed and there were no injuries or damage to the school.

Thank you to Riverside Fire Authority and to our CHS staff for their quick response and action!

Students and staff were allowed back into the building just after 1 p.m.

Levy Information Easily Available Online

We have placed information about our replacement educational programs & operations levy on our website at www.CentraliaSchools.org/levies. The information includes a short video, documents and flyers we have distributed, news updates, and more. You can also submit questions about the replacement levy to levyquestions@centraliaschools.org.

Election day is February 11 and ballots will begin arriving in mailboxes around January 25th.

Educational Programs & Operations Levy

Two years @ \$2.50 per
\$1,000 in assessed
property value.

February 11, 2020



Exhibit 3, CSD purchased Facebook advertisements near the election

Exhibit three:

ONE of at least two different ads the district ran once ballots were mailed

Centralia School District 401
Sponsored

Your EP&O levy helps create pathways to career and college success after graduation. Learn more about how your levy supports learning in Centralia!

LEVIES ARE FOR LEARNING

CENTRALIA.K12.WA.US
Levies are for Learning! [Learn More](#)

411 Comments 8K Shares

Why You're Seeing This Ad X

Only you can see this

You're seeing this ad because your information matches Centralia School District 401's advertising requests. There could also be more factors not listed here. [Learn More](#)

- Centralia School District 401 is trying to reach people, ages 25 to 55.
- Centralia School District 401 is trying to reach people whose primary location is Centralia, Washington.

What You Can Do

- Hide all ads from this advertiser
You won't see Centralia School District 401's ads [Hide](#)
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Was this explanation useful? [Yes](#) [No](#)

411 Comments 8K Shares

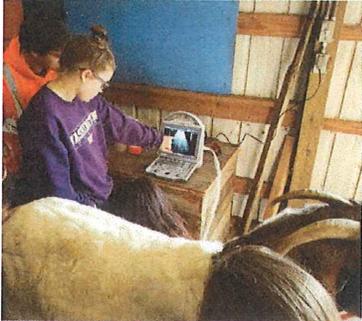
Exhibit 4, Centralia SD all-households mailing



Centralia School District

Replacement Educational Programs & Operations Levy

February 11, 2020 Special Election



Your Educational Programs & Operations Levy (EP&O) helps fill state funding gaps, including:

- Athletics
- Special Education
- Music & Arts Programs
- Transportation
- Food Services
- Additional teaching/support staff
- Technology purchases/replacement
- Staff professional development
- Career & Technical Education
- and much more...

NOT A NEW TAX

Centralia School District is seeking the replacement of the current levy, which expires in 2020.

The EP&O levy helps fund programs and services that are not fully funded by the state. Levies require a simple majority for passage.

\$2.50 per \$1,000 in assessed value for two years.

2021: \$6.5 million
2022: \$6.6 million

Low-income senior citizens may be exempt from this tax. Contact the Lewis County Assessor.

NOT A NEW TAX

Washington's basic education funding model does not fully fund the cost of education. It leaves gaps in important programs and services.

Local levies have been an important part of school district funding since the beginning of our statehood. They give our community a voice in how our schools are funded, and in what programs we value for our students.

In 2018, our local voter-approved levy was cut from \$2.83 per \$1,000 to \$1.50 by state legislation. This removed nearly \$2.5 million from our budget for programs and services not fully funded by the state. Since then, Centralia has relied on reserve funds to maintain levy funded programs. Last year, the legislature raised the limit back to \$2.50.

Our Board of Directors deliberated thoughtfully before deciding to approve a levy election at the \$2.50 rate. The replacement levy will restore our ability to fund programs and services that our community tells us are important to them.

The owner of a property assessed at Centralia's median value (\$197,500) will pay \$493.75 per year under the replacement levy.

LEARN MORE AT

WWW.CENTRALIASCHOOLS.ORG/LEVIES



LoriFast

Lori Fast - CSD Board President

PRSR STD
ECRWSS
U.S. POSTAGE
PAID
GLENDALE, CA
PERMIT #00017

*****ECRWSEDDM****

Local
Postal Customer

Exhibit 5, Citizens for Centralia Schools Campaign all mailbox mailing.

VOTE YES FOR SCHOOLS

Approving the Centralia School District replacement EP&O levy ensures continued funding for vital programs and services in our schools.

THIS IS NOT A NEW TAX!
It is the replacement of our current levy, which expires in 2020.

Remember to return your ballot by February 11!

Paid for by Citizens for Centralia Schools



Levies are for Learning!

Our Educational Programs & Operations Levy gives citizens in our school district a voice in how our schools are funded. It pays for important programs and services that are not included in the state's basic education formula. Technology, transportation, food services, athletics, music and arts programs, career & technical programs, additional teachers for lower class sizes, additional special education funding, and extra classroom support are all made possible by our levy.

Please vote yes for schools, and remember to return your ballot by February 11!

\$2.50 per \$1,000 in assessed value for two years

\$6.5 million in important, locally controlled funding for our schools annually.

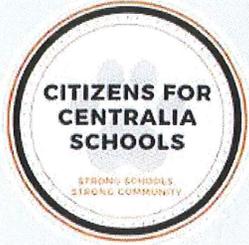
VOTE YES FOR SCHOOLS!

PRSRT STD
ECRWSS
U.S. POSTAGE
PAID
GLENDALE, CA
PERMIT #00017

*****ECRWSEDDM****

Local
Postal Customer

Exhibit 6, Citizens for Centralia Schools sign purchases.



Citizens for Centralia Schools
@CitizensForCentraliaSch
ools

Home

About

Photos

Events

Videos

Posts

Groups

Notes

Community

Create a Page

zensForCentraliaSchools/#

Like Follow Share ...

View 5 more comments



Citizens for Centralia Schools

December 17, 2019 ·

Would you like a sign for your yard? We will have some available at our meeting tonight- 6 p.m. @ Centralia Community Church of God.



Ed Petersen (Fri, 27 Mar 2020 at 4:56 PM)

to: "PDC Support" pdcc@pdcc.wa.gov

Hello, Tabitha

here are our responses to your questions. Always available if you need further information.

- How often does the district distribute/post Bond or Levy digital media? Please provide examples and dates posted/distributed for current campaigns and past campaigns.

Informational digital media posts are made frequently with every bond and levy campaign. Examples attached.

- Who produces digital media?

Most digital content is produced by our Public Relations Coordinator, Ed Petersen

- When were mailers sent regarding the Bond or Levy on the February 11, 2020 ballot?
- How many were sent?
We did one EDDM mailing of approximately 10,371 6x8 post cards. This does not differ from past practice except that we would normally send a 4 page printed newsletter. This year, we attempted to reduce costs by sending a postcard instead. A copy of the postcard is attached. The postcard was informational only.
- Dates of all mailings?
We did one mailing of a 6x8 post card. It arrived in mailboxes the week of Feb. 17.
- Cost of each mailing?
We paid \$3,455.23 for the post card printing and mailing. We did this in lieu of a planned four page newsletter.
- Was there a vendor used for printing, design or mailing of fliers/mailers? If so, provide vendor information and amount paid to vendor? Also, how was the vendor obtained?
We used GotPrint.com as the printing and mailing vendor. The cost for printing and mailing was \$3,455.23
- What is the budget for Bond and Levy publications this budget cycle and past cycles? (Give actual amounts spent as well as allotted budget amounts, and give the budget coverage years/dates)
For our bond campaign in 2016-17 we spent \$4,332.89, not including the costs of the election (ballots, etc.)
For our levy campaign in 2017-18 we spent \$2,067.35, again not including costs of the election.
- What mailing lists were used to send out the mailings for the Bond and Levy?
Post cards were mailed using USPS Every Door Direct Mail (EDDM) to every residential address and PO box in the 98531 zip code.
Additionally, we have a weekly e-newsletter (CSD QuickNews) that is sent to all parents (if we

have email information), students, and staff as well as community members who sign up to receive the weekly updates.

- Where did your district obtain the list?
We sent our postcards Every Door Direct Mail (EDDM). The post office delivers to every residential address under EDDM. We do not send levy or bond campaign mail to lists of specific people.
- Who is on the list? (all registered voters in what area or parents of registered students or another group)
The postcard was sent Every Door Direct Mail (EDDM) to every residential address in the 98531 zip code. We do not send levy or bond campaign mail to lists of specific people. Our mailing do not target people by voter status, demographic, geography or any other filter.
 - Who distributed the payroll deduction forms to employee mailboxes?
Citizens for Centralia Schools provided the payroll deduction forms and they were placed in employee mailboxes by a staff member affiliated with the group (with consent of the District) using their lunch break over a period of several days. We also distribute payroll deduction forms for other groups including United Way of Lewis County.
- Where are the mailboxes in question?
In non-public sections of school/facility offices
- When were the payroll deduction forms distributed?
Citizens for Centralia Schools provided payroll deduction forms for distribution in December 2019 and February 2020.
- Please provide copy of the entire payroll deduction request form.
A copy of the entire form was provided by Mr. Sullivan already. Interestingly, the form he provided was distributed *after* the date of his complaint.



Ed Petersen

Communications & Public Relations Coordinator

Public Records Officer

(O) 360.330.7600

(M) 360.520.6403

www.CentraliaSchools.org



Centralia School District 401



January 17 · 🌐

Levies support technology! Our IT team keeps a network of more than 3,000 chromebooks up-to-date and running to serve students. The devices have a lifespan of about 6 years, and nearly 75% of our Chromebooks will become unsupported and/or require replacement within two years.





Centralia School District 401



January 16 · 🌐

Students in 6th grade as well as middle and high school students are participating in a mock levy election this week. It is an opportunity for students to learn about the importance of voting, and how our levy system works.

They're shown a short video and then asked to enter their vote after reading the same statement that will appear on the ballot for the February 11 election.

So far, 69% of participating students have voted "yes" in the mock election.



1,621

People Reached

50

Engagements

[Boost Post](#)



9

5 Shares

Like

Comment

Share





Centralia School District 401



February 10 at 10:39 AM · 🌐

Mr. King's 6th graders are using heat to measure the energy content of food. Elementary science labs like these are made possible by the investment of levy funds into new science curriculum over the past several years.





Centralia School District 401

February 4 at 7:32 PM · 🌐



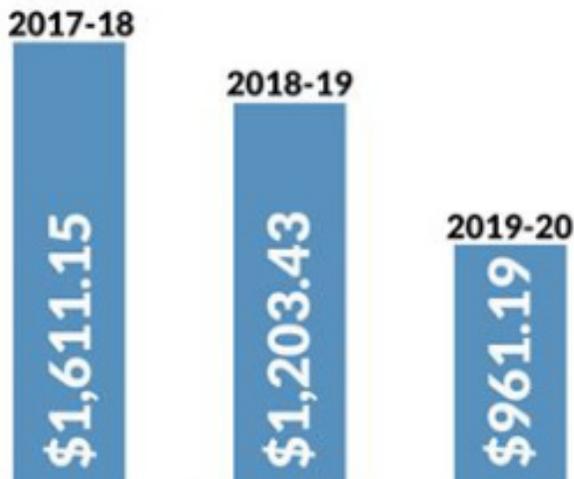
Even though per-student revenue from our local levy has fallen by more than \$2.2 million since 2017, the programs the levy funds are still there.

The average rate per \$1,000 for CSD levies since 2010 is \$2.49. The rate for the replacement EP&O levy is \$2.50.

The levy supports programs and services that are either not funded or not fully funded by the state or other sources.

We encourage everyone to participate in elections so your voice is heard. Please remember to return your ballot by February 11. Mailing is free, or there is a drop box at Centralia Community College (in the parking lot on Centralia College Blvd., behind Napa Auto)

Per-pupil levy funding change



Same programs & services. Less local levy funding for:

- Special Education
- Career & Technical Programs
- Transportation
- Food Services
- Athletics
- Music & Arts
- Professional Development
- Additional staff for lower class sizes
- Classroom supports
- Centralia Community Pool
- Building Maintenance
- & more.



Centralia School District 401



February 11 at 9:37 AM · 🌐

Our van fleet. Average miles = 147,752. Average age = 19.2 years. (Several of them are close to 190,000 miles).

Most school districts don't keep vehicles this long. Our mechanics go to heroic efforts to keep them safe and reliable, but heavy use vehicles don't last forever. Our trials, clubs, classes, and staff keep these cans moving to important activities and meetings. Some are used for daily student transportation.

Your EP&O levy will be used to help modernize the fleet, keeping safety a priority. This year, levy funds help purchase one new Ford Transit passenger van.





Centralia School District 401

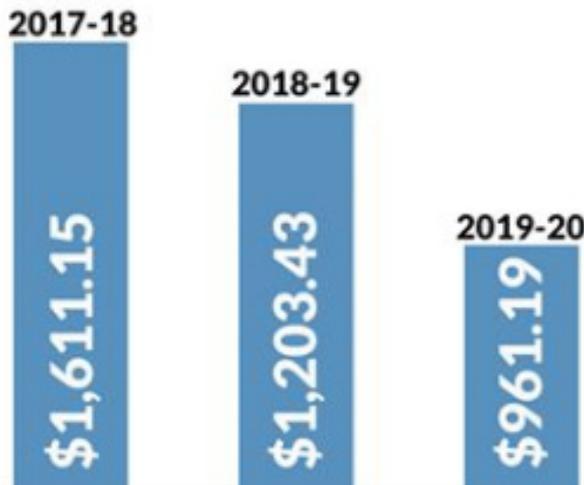
January 31 · 🌐



There's been a lot of conversation about per-pupil funding increases for education. While it's accurate to say per-pupil funding from all sources is up, that's not the whole story. Each revenue source can only be used for specific purposes. Our levy funded programs rely on local revenue because other sources do not fully fund them, or do not fund them at all.

So here's the story of per-pupil funding in terms of our local levy. In 2017-18 our local EP&O levy provided \$1,611.1... [See More](#)

Per-pupil levy funding change



**Same programs & services.
Less local levy funding for:**

- Special Education
- Career & Technical Programs
- Transportation
- Food Services
- Athletics
- Music & Arts
- Professional Development
- Additional staff for lower class sizes
- Classroom supports
- Centralia Community Pool
- Building Maintenance & more.

1,526

People Reached

101

Engagements

[Boost Post](#)



You and 15 others

2 Comments 3 Shares



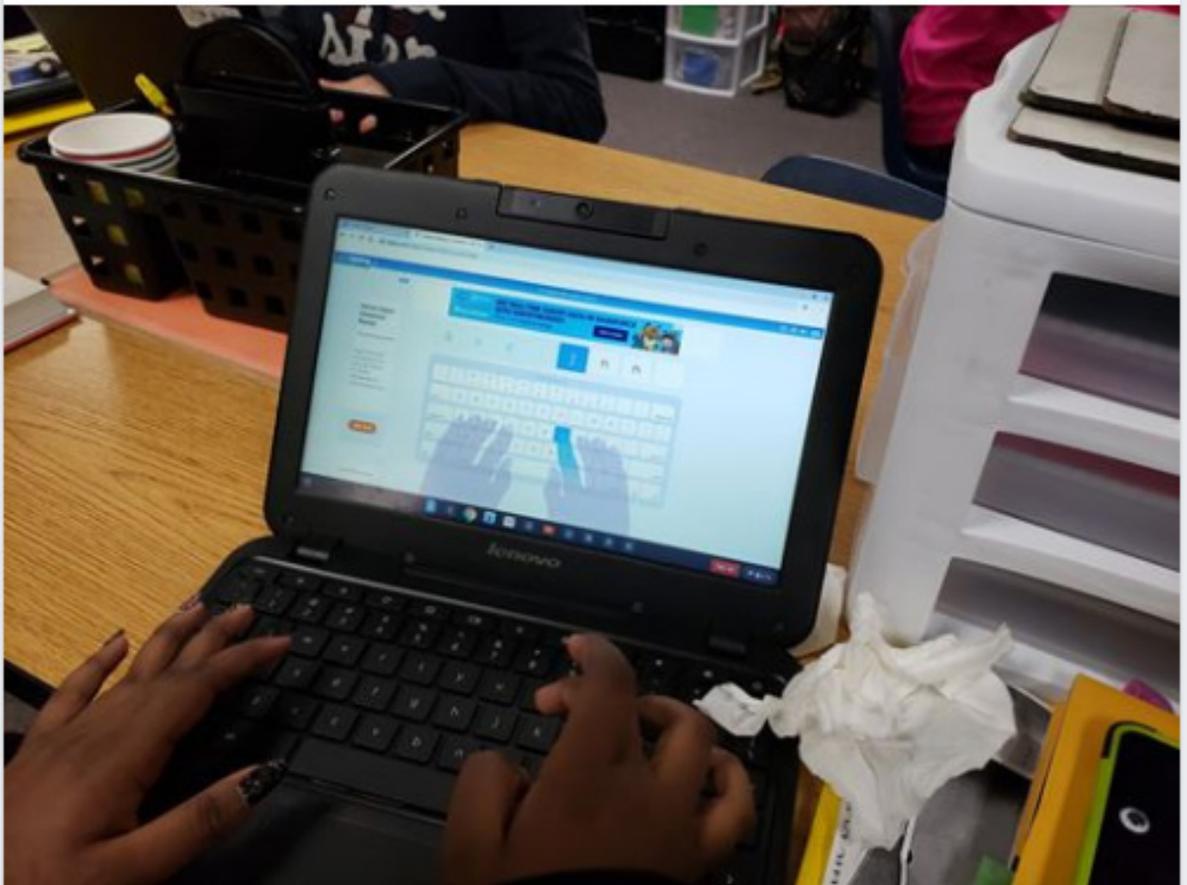
Centralia School District 401



January 26 · 🌐

Chromebooks are an integral part of academics in Centralia. At every grade level, students use them for classroom lessons, collaboration with peers, communication with teachers, state assessment taking, even preparing and submitting homework assignments. Their average life span is about 6 years of hard work. Our district is approaching a 1:1 ratio of student devices.

In the next two years, more than 75% of our district's chromebooks will require replacement - more than 2,000 ... [See More](#)



1,450
People Reached

53
Engagements

[Boost Post](#)



Centralia School District 401



January 22 · 🌐

There will be a community forum tomorrow evening at 6 p.m. in the Fords Prairie multipurpose room to discuss the replacement EP&O levy election. We will have a brief introduction to the levy, followed by a question and answer period.





Centralia School District 401

January 21 · 🌐



CHRONLINE.COM

Centralia School District Students Vote in Mock Levy Election

The students at Centralia High School and middle school participated in a...

1,331
People Reached

123
Engagements

[Boost Post](#)

👍 11

2 Comments

👍 Like

💬 Comment

➦ Share



Oldest ▾



Christie Malone I think having a mock election is awesome! It helps them better understand the process. We have no problem investing in our kids futures.

Like · Reply · Message · 5w

👍👍 3





Centralia School District 401



January 20 · 🌐

Centralia has one of the safest school bus fleets in Washington. The Replacement EP&O levy will help us make it even better by allowing us to implement new technology for routing efficiency. We will also be able to move toward a two-tiered bus system, where elementary aged students ride routes separate from older riders.

Learn more: <https://www.centralia.k12.wa.us/domain/1093>





Centralia School District 401



January 18 · 🌐

Have questions about the replacement EP&O levy? Visit our levy information page!

<https://www.centralia.k12.wa.us/site/default.aspx...>



1,024

People Reached

20

Engagements

Boost Post



Centralia School District 401



February 10 at 7:59 PM · 🌐

Tomorrow is election day. Ballots must be postmarked by Tuesday or placed in an official drop box by 8 p.m. Box locations are are Centralia College and the Historic Lewis County Courthouse.

www.CentraliaSchools.org/levies





Centralia School District 401

February 1 · 🌐



Congratulations to our CHS tiger basketball and cheerleader seniors!

Athletics are important levy-funded programs in our district! Participation in team sports teaches leadership, teamwork, and integrity - and it leads to academic success in the classroom. CHS teams have earned at least 17 WIAA Division 2A academic championships - more than any other school in our area.

#SeniorNight #WeAreCentralia





Centralia School District 401



February 11 at 8:54 AM · 🌐

Today is election day! Ballots must be postmarked by today to be counted. If you can't get them mailed in time, there are drop boxes located at Centralia College and the Historic Lewis County Courthouse that will be open until 8 p.m.

#WeAreCentralia #SomosCentralia



Tabitha Townsend replied, Mon, 30 Mar 2020 at 11:14 AM

To:

kvetter@centralia.wednet.edu

Cc:

twhiting@centralia.wednet.edu +1

epetersen@centralia.wednet.edu

Hi Ed,

Another couple of quick follow up questions:

* What has the budget been for the mailer, 4 page newsletter, in years past and what was the budgeted amount for this year?

* Digital advertisements or posting not produced by Ed Petersen are created by whom and what is the process for these contracts and what are the costs?

Thank you,

Tabitha Townsend

Compliance Coordinator

360.586.4555 | 360.753.1111

Ed Petersen replied, Thu, 2 Apr 2020 at 9:35 AM

To:

"PDC Support" <pdcc@pdcc.wa.gov>

Cc:

twhiting@centralia.wednet.edu +1

kvetteer@centralia.wednet.edu

Sorry about that. Here is what I found from the February Levy election. I will keep looking for others.

I'm not sure I have a clean payroll deduction form. But will keep looking. The one submitted looks like what I recall was the whole thing. It was just a small slip of paper we were given.

14 Attachments

[Ed Petersen](#) (Mon, 13 Apr 2020 at 8:00 AM)

to: "PDC Support" pdcc@pdc.wa.gov

Hello, we sent this response last week but didn't receive a confirmation...please see our responses in red below.

...

From: PDC Support <pdcc@pdc.wa.gov>

Sent: Thursday, April 2, 2020 6:04 PM

To: Kristy Vetter <kvetter@centralia.wednet.edu>

Cc: Tabitha Whiting <twhiting@centralia.wednet.edu>; Ed Petersen <epetersen@centralia.wednet.edu>

Subject: Re: PDC - Centralia School District Officials: Alleged Violation of RCW 42.17A.555 for misuse of public facilities; RCW 42.17A.495 for improper notification of rights on solicitation for payroll deduction (EY 20, Mar 20)

Hi Ed,

Thank you for the timely response. Please have follow questions back to me by **April 8, 2020**. Here are the questions:

* What has the budget been for the mailer, 4 page newsletter, in years past and what was the budgeted amount for this year?

The four page newsletter is printed 2-4 times annually and is paid for out of our public relations Contract Services budget. The Contract services budget covers things like websites, printing, and our mass notification system. We do not have a separate budget for our print newsletter. Costs vary per printing between \$1,500 and \$2,500 (not including mailing).

* Digital advertisements or posting not produced by Ed Petersen are created by whom and what is the process for these contracts and what are the costs?

We have not had anyone else produce, or have contracts with anyone else for digital advertisements or postings not created by Ed Petersen.

Thank you,

Tabitha Townsend
Compliance Coordinator
360.586.4555 | 360.753.1111

--

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

[Ed Petersen](#) replied, Mon, 18 May 2020 at 11:57 AM

To:

"Kristy Vetter" <kvetter@centralia.wednet.edu> +1

Cc:

twhiting@centralia.wednet.edu +2

Hello Phil,

Here are our responses:

Questions concerning the alleged violations of [RCW 42.17A.555](#):

1. You said, "Informational digital media posts are made frequently with every bond and levy campaign." Were you referring to the District's weekly e-newsletter, or does the district have a separate Facebook presence? If you have a separate Facebook presence, please describe that presence, and what activities took place that related to the 2/11/20 levy election (e.g. does the district make Facebook posts, purchase ads, boost the posts of others, etc.).

The district has facebook pages at www.facebook.com/centraliaschooldistrict and for each school (except Futurus High school). Any levy related posts were made to the district page and potentially shared from there by the school pages. We did spend a small amount (less than \$400) on boosting information posts about the levy. These boosted posts were limited to people living within 15 miles of centralia with no demographic, age, or other filters.

2. were there "informational digital posts" other than the e-newsletter and Facebook? If so, please explain.

We posted information about the levy to our website as well

3. What criteria is used to determine whether a group or organization can solicit employees of the district for donations or contributions?

Policy 4060 and 4060P govern distribution of materials in our district. Our policies are available here: <https://app.eduportal.com/folders/public/list/49572>

4. Are all groups given the same access to employee mail boxes as was given to Citizens for Centralia Schools?

We review any such request individually and do not distribute materials that would be considered to be profane, offensive, discriminatory, or otherwise would violate employee or student rights.

5. If a levy opposition committee had asked to place material in employee mail boxes, soliciting campaign contributions, would they have been allowed to do so?

As long as the material met the criteria described in our response to #4, yes.

6. Is there a district policy concerning placing material in employee mail boxes?

No.

7. Was the material placed in employee mail boxes limited to the payroll deduction authorization forms?

Yes. We did not receive any other requests from any organization to distribute any other kind of levy information.

8. Did the material placed in employee mail boxes include other information, such as a solicitation letter, instructions about the payroll deduction, information about Citizens for Centralia Schools, or political advertising about the 2/11/20 levy election?

The material placed in mailboxes was a copy of the payroll deduction form that was provided to us and nothing else. This payroll deduction opportunity was not new to our employees for this campaign. It has been an available voluntary deduction in our district for at least 10 years.

Questions concerning the alleged violations of [RCW 42.17A.495](#)

1. WAC [390-17-100](#) requires the employer (Centralia School District) to have a payroll deduction authorization form in hand, **before** deducting funds, with specific language concerning employee rights, informing the employee that they cannot be discriminated against for failing to make contributions to the political committee, and that they may revoke their contribution at any time.

2. WAC [390-17-110](#) explains the annual notification requirement of the employer, that must be accomplished by June 30 of each year, to ensure that each employee who has authorized payroll

deductions to a political committee is notified on an annual basis of the nondiscriminatory provisions of [RCW 42.17A.495\(2\)](#) and that they have the right to revoke their payroll deductions at any time. The annual notification must comply with the provisions of [WAC 390-17-110](#), which includes specific instructions about how to revoke their payroll deduction at any time. This rule allows the employer and political committee to decide which entity will send out the annual notification by June 30 of each year, **but**, the employer is responsible for ensuring that this process has in fact taken place.

3. Were school district officials aware of the requirements of [RCW 42.17A.495](#), and WACs [390-17-100](#) and [390-17-110](#) at the time they accepted the payroll authorization forms and began deducting funds and sending the funds to the political committee, Citizens for Centralia Schools?

No, we were not familiar with those WAC requirements.

4. If not, are district officials willing, as soon as possible, to obtain proper authorization forms that comply with [RCW 42.17A.495](#) and [WAC 390-17-100](#) for each employee who has authorized payroll deductions for Citizens for Centralia Schools?

Absolutely, yes.

5. How soon can you accomplish this task? I realize this is a labor intensive project, especially given our current COVID-19 health crisis, and that you may not be able to complete these steps by May 31. If that is the case, we will need to discuss how to proceed.

We can accomplish this by the end of June, 2020. There are not a large number of employees participating in this payroll deduction program.

6. Are district officials willing to comply with the annual notification requirements of [WAC 390-17-110](#)?

Yes, absolutely.

7. Are the payroll deductions being allowed pursuant to a Collective Bargaining Agreement with employees who belong to a union?

The Citizens for Centralia Schools payroll deductions are not attached or related to any collective bargaining agreement.

Ed Petersen

Public Relations & Communications Coordinator

Hi Valerie and Lance,

I am following up with questions concerning allegations in the complaint against Centralia School District officials and Centralia School District. On 4/30/18, PDC staff asked the following question:

"You said, "Informational digital media posts are made frequently with every bond and levy campaign." Were you referring to the District's weekly e-newsletter, or does the district have a separate Facebook presence? If you have a separate Facebook presence, please describe that presence, and what activities took place that related to the 2/11/20 levy election (e.g. does the district make Facebook posts, purchase ads, boost the posts of others, etc.)."

Eric Petersen responded:

"The district has facebook pages at www.facebook.com/centraliaschooldistrict and for each school (except Futurus High school). Any levy related posts were made to the district page and potentially shared from there by the school pages. We did spend a small amount (less than \$400) on boosting information posts about the levy. These boosted posts were limited to people living within 15 miles of centralia with no demographic, age, or other filters."

1. What information was boosted? Please provide the text of what was boosted.

Three posts from the Facebook account "Centralia School District 401" were boosted. Attached to this email is a PDF file with the three posts in question.

The text of the January 17 post reads: "Levies support technology! Our IT team keeps a network of more than 3,000 chromebooks up-to-date and running to serve students. The devices have a lifespan of about 6 years, and nearly 75% of our Chromebooks will become unsupported and/or require replacement within two years." A picture of a student with a Chromebook is part of the post, with the text: "LEVIES ARE FOR LEARNING."

The text of the January 19 post reads: "Your EP&O levy helps create pathways to career and college success after graduation. Learn more about how your levy supports learning in Centralia!" A picture of graduating students is part of the post, as is a link to the District website's page for the February 11, 2020 levy election, which the PDC has already been provided via the initial complaint (page 9 of the case document "66039 Centralia School Dist Officials Complaint").

The text of the January 20 post reads: "Centralia has one of the safest school bus fleets in Washington. The Replacement EP&O levy will help us make it even better by allowing us to implement new technology for routing efficiency. We will also be able to move toward a two-tiered bus system, where elementary aged students ride routes separate from older riders." The text then continues with a link to the District website page for the February 11, 2020 levy election, which the PDC has already been provided via the initial complaint (page 9 of the case document "66039 Centralia School Dist Officials Complaint").

2. Did the District restrict its paid boosting to "information posts about the levy" that were already part of the District's Facebook postings?

The District interprets the PDC to be asking whether the boosting was restricted to District Facebook postings that the District already provided in its responses to the PDC's request for examples. The Facebook posts from January 17 and 20 were already provided in the District's March 27, 2020 responses (pages 3 and 12 of the case document "66039 Centralia SD Officials Response"). The Facebook post from January 19 was not previously submitted as an example.

3. Did the District pay to boost “information posts about the levy” that were posted by someone other than the District?

No.

Other Questions/Requests:

4. Please provide a copy of the proposed payroll deduction authorization form the District will be using to correct the authorization forms currently on file for contributions to Citizens for Centralia Schools.

The District ceased making the payroll deductions for Citizens for Centralia Schools on May 31, 2020. The District will not be authorizing payroll deductions to Citizens for Centralia Schools until and unless the District can verify that there are forms on file that meet the requirements of WAC 390-17-100. The District does not have a copy of a proposed payroll deduction authorization form at this time.

5. By what date do you expect to have all corrected authorizations signed? (The previous estimate was by 6/30/20.)

As stated in response to the previous question, the District does not have a copy of a proposed payroll deduction authorization form at this time. If Citizens for Centralia Schools provides the District with a form compliant with WAC 390-17-100, the District would distribute the form to employees for their authorization. At this point, it is too early to predict when employees would return any signed forms because no new form has been proposed by Citizens for Centralia Schools for distribution.

6. How many authorizations were processed for contributions to Citizens for Centralia Schools?

In April 2020, payroll deductions were made to 29 employees for contributions to Citizens for Centralia Schools.

7. What was the universe of District employees who received a payroll deduction authorization form in their employee mailbox?

All employees who have a mailbox received a payroll deduction form. This included certificated staff, classified staff, and administrators.

8. Did the universe include teachers at their respective work locations?

Yes.

9. Did the universe include support staff? Management?

Yes to both.

10. Were District employees given advance notice that the authorization forms were going to be placed in their employee mail boxes?

No.

11. Who approved the request to place the authorizations in the employee mail boxes?

Former Superintendent Mark Davalos.

12. Who placed the authorizations in the employee mail boxes?

Ed Petersen placed most of the authorizations. Secretaries at school buildings may have placed some of the authorizations as well.

If you have questions, let me know. Thank you.

Phil Stutzman
Compliance Officer
360-664-8853

TO: Centralia School District c/o
Valerie Walker at valerie@pfrwa.com
Lance Andree at lance@pfrwa.com

FROM: Phil Stutzman, Compliance Officer, PDC
DATE: June 22, 2020
SUBJECT: Follow-up Questions to Complaint, Alleged Violation 1, PDC Case 66039

Initially, Tabitha Townsend asked questions about the District's work concerning the February 11, 2020 levy election, and Ed Petersen provided helpful information. I asked follow-up questions about the purchase of Facebook boosts, and the payroll deduction authorizations, which you answered. Thank you I am following up with additional questions concerning alleged violation 1. I am attaching a copy of the complaint. Alleged violation 1 has four parts:

- 1A Staff time
- 1B Staff time arranging a mailing for the Citizens for Centralia Schools Campaign
- 1C Mailing February 1
- 1D Electioneering communication using students as couriers
- 1E Electioneering email messages using the district directory

Please address each of the allegations in each part of allegation 1. As part of your response, please explain and provide details about the alleged "deploying district robo-calls about the levy election" listed in allegation 1A (e.g. Who were robo-calls directed to? When were the calls made? What was the message? What was the cost? Who authorized or approved making the robo-calls? Has the District made robo-calls for past levy or bond elections? Thank you.

1A Staff time. Centralia School District's Public Relations & Communications Coordinator has been working daily for two months generating content, taking campaign photographs, writing and posting Facebook posts, creating blog entries, designing at least one patron mailing, preparing several district parent mailings, producing a video, creating visual images, designing and distributing literature, setting up a community meeting, sending a dozen email alerts about the levy election, preparing and deploying district robo-calls about the levy election, setting up and marketing a student mock election, and communications with reporters on behalf of a ballot measure's passage. Exhibits 1-4.

With respect to alleged "Campaign photographs," Mr. Petersen did not take any photographs for the express purpose of levy communications. Rather, photographs were acquired through Mr. Petersen's normal and regular work activities. Mr. Petersen regularly incorporates photographs into District communications with the public.

Similarly, the District regularly uses Facebook to communicate with the District community. The "writing and posting Facebook posts" was a normal and regular part of District communications, as a review of the District's Facebook page reflects. The District uses Facebook for a wide variety of communications, including providing updates on new District leaders, sharing local news articles related to District students, offering reminders about school breaks and events, providing news regarding District athletics, etc.

Mr. Petersen did not "create[e] blog entries." The District did not maintain a separate blog on the levy and Mr. Petersen did not use "blog entries" for levy communications. The District maintains a website and Complaint Exhibit 1 reflects what appear to be screenshots or pictures of that page. Although the Complainant labels Exhibit 1 as a "website indicating a host of district outreach efforts to pass the levy,"

the materials reflect informational materials that fairly present facts about the levy (pages 9–14 of the case document “66039 Centralia School Dist Officials Complaint”) or a way for members of the public to ask questions about the levy (page 15 of the case document “66039 Centralia School Dist Officials Complaint”).

With respect to Mr. Petersen’s work on mailings, a video, visual images, literature, setting up a community meeting, and email alerts, these are also part of the District’s normal and regular activities. The Complaint includes various overlapping allegations, and the District addresses the Complaint’s specific allegations regarding mailings in Section 1B–1D and the allegations regarding emails in Section 1E.

As for the robo-call allegation, only one robo-call was made connected to the levy. The robo-call was made on January 23rd, 2020 and the call went out to parents/guardians of District students. The text of the call was: “We hope you will join us this evening at 6 p.m. for a community forum regarding our upcoming replacement levy election. We will have a short introduction to the levy followed by an informal question and answer period.” There was no cost associated with this call. Per Ed Petersen, Mark Davalos authorized the robo-call and the forum for the question and answer session. Only two community members attended the forum. The District does not have records of robo-calls from previous years because the District has changed communication systems, but to the best of Mr. Petersen’s recollection, robo-calls may have been used in past elections to remind District families to vote, but not to advocate for specific propositions.

Turning to the mock student election, the District did not require teachers to incorporate the mock election into their lessons. Some social studies teachers at Centralia High School and Centralia Middle School chose to do so, as did several sixth-grade teachers. Mr. Petersen produced the informational video on the levy that was provided to those students who did participate in this activity, and per Mr. Petersen, Mark Davalos approved this action.

Lastly, Mr. Petersen’s role with the District necessarily involved communicating with reporters. It is unclear if there is a specific example the Complainant is referring to, but Mr. Petersen did not advocate on behalf of the levy proposition’s passage during the exercise of his duties responding to press inquiries.

1B Staff time arranging a mailing for the Citizens for Centralia Schools campaign. Centralia public relations staffer, Petersen, is also a member of the campaign committee. He is responsible for the preparation of exhibit 4, a school district mailing. A near identical mailing (exhibit 5) using the same printer and mailhouse was prepared for the campaign committee. The allegation is that CSD staff time, computer and art was prepared for the campaign.

Mr. Petersen denies that any District staff time or property was used to create materials for Citizens for Centralia Schools. Mr. Petersen has a long career as a photographer and designer of print publications and materials that predates his employment with the District. To the extent that he worked with Citizens for Centralia Schools, it was during his own personal time and using his own personal property and equipment.

1C Mailing Feb 1. Centralia School District’s PR Coordinator sent a mailing to all households in the area. This mailing was coordinated with the campaign and was sent within 14 days of the election. The content of one known mailing is exhibit 4. There could be others.

Mr. Petersen did not coordinate a District mailing with Citizens for Centralia Schools. It is a normal and regular practice of the District to use mailed printed publications to share information with the community and to encourage participation in elections even when the District does not have a levy proposition on the ballot. The mailing that the District sent (Complaint Exhibit 4) differed from the postcard mailed by Citizens for Centralia Schools (Complaint Exhibit 5) in a variety of ways. For example, the District's mailing included three pictures with text above and below the pictures, whereas the Citizens for Centralia Schools mailing used one picture with text overlaying it. For another example, the mailing from the District was labeled with the District's name and signed by the Board President. The mailing from Citizens for Centralia Schools, however, noted that it was paid for by Citizens for Centralia Schools and did not claim to be from the District.

1D electioneering communication using students as couriers. Since November, reportedly several mailings were sent to families about the levy using students as couriers to carry these election-affecting messages.

The District sent home one flyer with students related to the February levy proposition. Sending messages through "kid mail" is a normal and regular practice of the District. The District uses this communication method to disseminate a wide variety of district information unrelated to levies.

1E electioneering email messages using the district directory. Since November, reportedly several email messages were sent to families using the school district's family directory. Exhibit 2 is one such example discussing turning in ballots and how the district will collect ballots from patrons.

The emails included in Complaint Exhibit 2 include general information about voting (pages 18 and 20 of the case document "66039 Centralia School Dist Officials Complaint"), factual information about the District's levy (pages 18 and 20 of the case document "66039 Centralia School Dist Officials Complaint"), and information about a forum event during which community members could discuss the District's levy (pages 21 and 24 of the case document "66039 Centralia School Dist Officials Complaint"). Additionally, some of the emails included in Exhibit 2 were from the District's e-newsletter, QuickNews, which is sent at least twice monthly during the school year (pages 21–23 of the case document "66039 Centralia School Dist Officials Complaint"). The District uses email communications and QuickNews updates to disseminate information on topics unrelated to levies as part of its normal and regular practice.