

**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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**Public Disclosure Commission Statement of Understanding**

**Seattle Foundation: PDC Case 92059**

I, David Bley, as an officer or fiduciary for the Seattle Foundation, acknowledge that  
(Name of Officer) the Seattle Foundation violated:

1. RCW 42.17A.207 by failing to timely register a statement of organization (PDC Form C-1 IC) for four Incidental Committees as required within two weeks for contributions made to four political committees in excess of \$25,000, and having received at least one payment in excess of \$10,000 in calendar years 2019, 2020 and 2021.
2. RCW 42.17A.235 and .240 by failing to timely file Incidental Committee reports (PDC Form C-8) disclosing the monetary or in-kind contributions made from the Incidental Committee, and the ten largest sources of payments received above \$10,000 during the calendar year as required for the sponsor.

The Seattle Foundation is a 501(c)(3) nonprofit community-based foundation founded in 1946. PDC staff's investigation found that the following four Seattle Foundation (SF) funds were required to register and report as Incident Committees for calendar years 2019 through 2021: (1) SF- 2020 Civic Leadership Area of Interest Fund; (2) SF - 2021 Civic Leadership Area of Interest Fund; (3) SF - 2019 Climate Justice Area of Interest Fund; and (4) SF - 2019 Catalyzing Community Area of Interest Impact Fund.

**2021 Contribution: SF- 2021 Civic Leadership Area of Interest Fund**

- The SF- 2021 Civic Leadership Area of Interest Fund made a \$40,000 monetary contribution that was disclosed as having been received on July 23, 2021, by Best Starts for Kids, a 2021 local ballot committee in support of a King County levy in support of children on the August 3, 2021 primary election ballot.

- SF- 2021 Civic Leadership Area of Interest Fund was required to file a C-1 IC report within two weeks of making the \$40,000 contribution to Best Starts for Kids or no later than August 6, 2021. In addition, SF- 2021 Civic Leadership Area of Interest Fund was required to file a C-8 report no later than August 6, 2021, disclosing the \$40,000 contribution made to Best Starts for Kids, and the top 10 largest sources of payments received in excess of \$10,000.
- SF- 2021 Civic Leadership Area of Interest Fund filed both the C-1 IC report and C-8 reports on March 4, 2022.

2020 Contribution: SF- 2020 Civic Leadership Area of Interest Fund

- The SF- 2020 Civic Leadership Area of Interest Fund made a \$50,000 monetary contribution that was disclosed as having been received on October 22, 2020, by Yes for Transit, a 2020 local ballot committee in support of a City of Seattle transportation ballot measure on the November 3, 2020 general election ballot.
- SF- 2020 Civic Leadership Area of Interest Fund was required to file a C-1 IC report within two weeks of making the \$50,000 contribution to Yes for Transit or no later than November 5, 2020. In addition, SF- 2020 Civic Leadership Area of Interest Fund was required to file a C-8 report no later than November 5, 2020, disclosing the \$50,000 contribution made to Yes for Transit, and the top 10 largest sources of payments received in excess of \$10,000.
- SF- 2020 Civic Leadership Area of Interest Fund filed both the C-1 IC report and C-8 reports on March 4, 2022.

2019 Contribution: SF - 2019 Climate Justice Area of Interest Fund

- The SF – 2019 Climate Justice Area of Interest Fund made a \$50,000 monetary contribution that was reported as received on October 18, 2019, by Keep Washington Rolling, a statewide ballot measure committee concerning transportation.
- SF – 2019 Climate Justice Area of Interest Fund was required to file a C-1 IC report within two weeks of making the \$50,000 contribution to Keep Washington Rolling or no later than November 1, 2019.

- In addition, SF – 2019 Climate Justice Area of Interest Fund was required to file a C-8 report no later than November 1, 2019, disclosing the \$50,000 contribution made to Keep Washington Rolling, and the top 10 largest sources of payments received in excess of \$10,000.
- SF – 2019 Climate Justice Area of Interest Fund filed both the C-1 IC report and C-8 reports on March 4, 2022.

2019 Contribution: SF - 2019 Catalyzing Community Area of Interest Impact Fund.

- The SF - 2019 Catalyzing Community Area of Interest Impact Fund made a \$50,000 monetary contribution that was disclosed as received on October 21, 2019, by Washington Fairness Coalition, a statewide ballot committee in support of Initiative 1000/Referendum 88, a statewide initiative on the November 5, 2019 general election ballot.
- SF - 2019 Catalyzing Community Area of Interest Impact Fund was required to file a C-1IC within two weeks of making the \$50,000 contribution to the Washington Fairness Coalition or no later than November 4, 2019. In addition, SF - 2019 Catalyzing Community Area of Interest Impact Fund was required to file a C-8 report no later than November 4, 2019, disclosing the \$50,000 contribution to the Washington Fairness Coalition, and the top 10 largest sources of payments received in excess of \$10,000..
- SF - 2019 Catalyzing Community Area of Interest Impact Fund filed both the C-1 IC report and C-8 reports on March 4, 2022.

The Seattle Foundation and its four area of interest funds would like to avoid the time and expense resulting from staff scheduling a Brief Adjudicative Proceeding (Brief Enforcement Hearing) conducted by the Public Disclosure Commission (PDC).

Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, the Seattle Foundation is completing this Statement of Understanding, and enclosing a check or money order in the amount of \$1,000 as a penalty payment to resolve this matter. The \$1,000 penalty assessed in this matter was for the following acknowledged violations of RCW 42.17A:

- A \$500 penalty for four violations of RCW 42.17A.207, \$125 for each violation, for failing to timely register four statements of organization (PDC Form C-1 IC) for four incidental committees as required for contributions made during calendar years 2019, 2020, and 2021.

- A \$500 penalty for four violations of RCW 42.17A.235 and .240, \$125 for each violation, for failing to timely file incidental committee reports (C-8 reports) for four incidental committees as required to contributions made during calendar years 2019, 2020, and 2021.

The \$1,000 penalty is being assessed in accordance with the specific facts of this case, the Brief Enforcement Penalty Schedule, and the mitigating and aggravating factors adopted by the Commission for Brief Enforcement Hearings as set forth in WAC 390-37-143.

The Seattle Foundation understands that by completing this Statement of Understanding, the foundation acknowledges four violations of RCW 42.17A.207, and four violations of RCW 42.17A.235 and .240, as set forth above and is waiving it's right to a hearing in this matter.

The Seattle Foundation further understands that this will resolve the issue of failing to timely register and report four incidental committees for political contributions made to political committees during calendar years 2019, 2020, and 2021.

David Bley  
s/ David Bley (Mar 31, 2022 13:06 PDT)  
Electronically Signed by

March 30, 2022  
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 print, sign and mail this Statement of Understanding along with your payment to:

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








# Seattle Foundation Statement of Understanding (PDC Case 92059)

Final Audit Report

2022-03-31

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