



State of Washington
PUBLIC DISCLOSURE COMMISSION
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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

**WASHINGTON AGAINST
DISCRIMINATION EVERYWHERE
(WADE)**

Respondent.

PDC Case 121957

Findings of Fact,
Conclusions of Law, and
Order Imposing Fine

Pursuant to the notice of brief enforcement hearing (brief adjudicative proceeding) sent to Washington Against Discrimination Everywhere (WADE) on February 7, 2024, a brief adjudicative proceeding was held on February 29, 2024, remotely from Olympia, WA by live audio and online transmission. The purpose of the hearing was to consider whether the Respondent violated RCW 42.17A.235 & .240 by failing to file timely and accurate Summary, Full Campaign Contribution and Expenditure (C-4) reports and RCW 42.17A.205 by failing to file an updated Committee Registration (C-1pc) within 10 days of a material change.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Chair Nancy Isserlis was the Presiding Officer and Vice Chair Allen Hayward attended. The Commission staff was represented by Compliance Officer Erick Agina. The Respondent was represented by special advisor Jesse Wineberry.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. WADE was a political action committee that supported Initiative Measure No.1776, a statewide ballot measure/proposition in the 2020 election year.
2. On June 18, 2020, WADE filed a Committee Registration (C-1pc) as a “Continuing” committee and listed Dr. Terry Ross, Dr. Lynn French, Amanuel Mamo, and Abdirahman Mohamud, CPA as Main Sponsor, Co-Sponsors and Treasurer, respectively.
3. On December 16, 2023, the PDC staff received a complaint filed by Glen Morgan alleging that WADE had violated RCW 42.17A.235(9) and .240 by failing to file accurate Summary, Full Campaign Contribution and Expenditure (C-4) reports and to ensure that the reports

were certified as correct by a treasurer currently retained by the committee to perform treasury duties. Mr. Morgan also alleged that WADE failed to file an updated Committee Registration (C-1pc) to report a material change in the information previously submitted on the C-1pc within ten days following the change.

4. The Respondent did not amend its C-4 reports and C-1pc by the date of the enforcement hearing.
5. The Respondent has two prior violations.

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately file C-4 reports, and RCW 42.17A.205 by failing to report a material change in the information previously reported on its C-1pc within ten days following the change.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED that the Respondent shall amend the required C-4 reports and is assessed a total civil penalty of \$1,000, in accordance with the Brief Enforcement penalty schedule set forth in WAC 390-37-143.**
2. **It is further ordered that \$950 of the \$1,000 civil penalty is suspended on the following conditions:**
 - a. **The Respondent does not commit any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this Order. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction.**
 - b. **The Respondent pays the \$50 non-suspended civil penalty within 30 days of the date of this Order.**
 - c. **The Respondent amends the required C-4 reports within 30 days of the date of this Order.**
3. **It is further ordered that, if the Respondent fails to comply with any of the above conditions:**

- a. **The full \$1,000 penalty shall immediately become due without further action by the Commission, and PDC Staff is directed to refer the matter to collections and/or commence other legal proceedings as authorized by RCW 42.17A and 390 WAC.**
- b. **The missing C-4 reports shall be due immediately.**

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 8th day of March 2023.

Public Disclosure Commission

Peter Frey Lavallee
Peter Frey Lavallee (Mar 8, 2024 11:51 PST)
Peter Lavallee
Executive Director

I, Erick O. Agina, certify that I mailed a copy of this order to the Respondent at their respective address postage pre-paid, on the date stated herein. I certify that I also emailed a copy of this order to the Respondent at their email address of record.

Electronically Signed *Erick O. Agina* DATE: 3/8/2024

APPEALS OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).
- All requests for review must be submitted electronically to pdcc@pdcc.wa.gov **REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.**

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the FINAL ORDER. *See* WAC 390-37-142(7).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO THE SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.

121957 Final Order - Washington Against Discrimination Everywhere (WADE)...

Final Audit Report

2024-03-08

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