



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	PDC Case 143923
Karen Burke,	Findings of Fact,
Respondent.	Conclusions of Law, and
	Order Imposing Fine

Pursuant to the notice of brief enforcement hearing (brief adjudicative proceeding) sent to Karen Burke on July 23, 2024, a brief adjudicative proceeding was held on August 29, 2024, remotely from Olympia, WA. The purpose of the hearing was to consider whether Karen Burke violated RCW 42.17A.235 & .240 by failing to timely and accurately disclose expenditures for vendor debt repayments and outstanding candidate loans on Summary Full Campaign Contribution and Expenditure reports (C-4 reports).

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commissioner Allen Hayward was the Presiding Officer, and Commissioner J Robert Leach attended. The Commission staff was represented by Compliance Coordinators Jordan Campbell and Colin Peeples and Compliance Officer Jennifer Hansen. The Respondent did not participate in the hearing or provide written testimony.

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

FINDINGS OF FACT

1. On February 11, 2019, Karen Burke filed the C-1 report, selecting the “Full Reporting” option and listing Camila Powell as Treasurer.
2. On October 17, 2023, PDC staff received a complaint filed by Patricia Mullett alleging that Karen Burke had violated RCW 42.17A.235 and .240, by failing to timely and accurately file

Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing expenditures for vendor debt repayments and outstanding candidate loans.

3. The last C-4 report submitted by the Respondent for election year 2019 included activity from July 30 to August 31, 2019, and disclosed a cash-on-hand balance of \$3,154.75 and \$19,391.53 in outstanding liabilities. The debts owed were for services provided by Blue Spruce Strategies LLC in the amount of \$13,391.53 and a \$6,000 loan owed to the Respondent.
4. In her response to the complaint received January 16, 2024, the Respondent confirmed that her 2019 campaign had no outstanding debts, stating that she and her spouse paid the balance owed using personal funds.

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. Karen Burke violated RCW 42.17A.235 & RCW 42.17A.240 by failing to timely and accurately disclose expenditures for vendor debt repayments and outstanding candidate loans on C-4 reports.

ORDER

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

1. **IT IS HEREBY ORDERED that the Respondent shall file any missing campaign reports disclosing the payment or forgiveness of any outstanding debts reported as still owed as of August 31, 2019, within 30 days of this Order and is assessed a total civil penalty of \$500 in accordance with the Brief Enforcement penalty schedule set forth in WAC 390-37-143.**
2. **It is further ordered that \$250 of the \$500 penalty is suspended on the following conditions:**
 - a. **The non-suspended portion of the penalty (\$250) is paid by the Respondent within 30 days of the date of this Order.**

- b. **The Respondent files any missing reports disclosing the payment or forgiveness of any outstanding debts reported as still owed as of August 31, 2019, within 30 days of this Order.**
 - c. **The Respondent provides documentation to PDC staff regarding the above referenced debt payments, 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 \$500 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. **Any missing campaign reports shall be due immediately.**

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

Entered this 27th of September, 2024.

Public Disclosure Commission

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

I, Jennifer Hansen, certify that I emailed a copy of this order to the Respondent at their respective email address of record.

Electronically Signed Jennifer Hansen September 27, 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 SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.