

STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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**Public Disclosure Commission Statement of Understanding
Local 48 Electricians Political Action Committee
PDC Case 158465**

I, Garth Bachman, in my capacity as the authorized representative of the Local 48 Electricians Political Action Committee (PAC), hereby acknowledge that, during years 2019, 2020, 2021, 2022, 2023, and 2024 the Local 48 Electricians PAC violated RCW 42.17A.250 by failing to timely and accurately report as an out-of-state political committee.

The facts are as follows:

- Under RCW 42.17A.250(2), an out-of-state political committee is required to file an Out-Of-State Political Committee (C-5) Report “no later than the tenth day of the month following any month in which a contribution or other expenditure reportable under subsection (1) of this section is made. An out-of-state committee incurring an obligation to file additional statements in a calendar year may satisfy the obligation by timely filing reports that supplement previously filed information.”
- The Local 48 Electricians Political Action Committee (PAC) is a political action committee of the International Brotherhood of Electrical Workers, Local 48 union, based in Portland, Oregon.
- Local 48 Electricians PAC receives contributions from Washington residents. The PAC expends those funds by being the primary contributor to the Southwest WA Electricians PAC 48 of WA, a Washington state registered political action committee. The Southwest WA Electricians PAC participates in Washington elections by contributing to candidates and other committees. These two PACs share the same stated purpose of supporting candidates and measures advocating family, living wages, benefits and working conditions.
- On September 25, 2024, the Local 48 Electricians PAC filed three Out-of-State Political Committee (C-5) reports with the Washington State Public Disclosure Commission (PDC) for 2024. The reports were amended on October 3rd, 4th and 7th in 2024 and

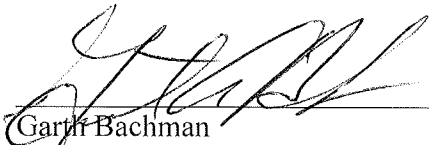
included expenditures to Southwest WA Electricians PAC 48 of WA for a total of \$110,839.02 between February and September 2024.

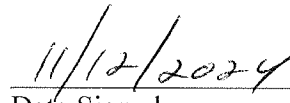
- These reports also showed a total of \$251,278.77 reported as contributions received from Washington state residents.
 - The September report was timely, but the reports covering earlier periods in the year were untimely.
- On September 25, 2024, the Local 48 Electricians PAC filed four C-5 reports with the PDC for 2023. The reports were amended on October 10, 2024, and included expenditures to Southwest WA Electricians PAC 48 of WA for a total of \$71,116.99 between January and September 2023.
 - These reports also showed a total of \$194,193.90 reported as contributions received from Washington state residents.
 - All of the reports were filed late.
 - On October 18, 2024, the Local 48 Electricians PAC filed the following C-5 reports with the PDC:
 - Four C-5 reports were filed for 2022. The reports showed expenditures to Southwest WA Electricians PAC 48 of WA for: \$21,701.61 on February 11, 2022; \$32,368.75 on June 1, 2022; \$36,943.95 on September 1, 2022; and \$38,335.22 on November 17, 2022.
 - All of the reports were filed late
 - On October 29, 2024, the Local 48 Electricians PAC filed the following C-5 reports with the PDC:
 - Eight C-5 reports were filed for 2021 and are late filed. The reports showed expenditures to Southwest WA Electricians PAC 48 of WA for: \$22,425.09 on January 25, 2021; \$11,998 on February 22, 2021; \$9,936.36 on March 30, 2021; \$21,058.22 on May 17, 2021; \$23,419.74 on July 30, 2021; \$10,610.03 on September 8, 2021; \$11,609.93 on October 15, 2021; and \$36,116.28 on December 8, 2021.
 - Six C-5 reports were filed for 2020 and are late filed. The reports showed expenditures to Southwest WA Electricians PAC 48 of WA for: \$32,008.32 on January 6, 2020; \$20,678.12 on March 2, 2020; \$10,308.66 on April 16, 2020; \$21,475.84 on June 10, 2020; \$20,466.20 on August 28, 2020; and \$30,439.61 on November 10, 2020.
 - Nine C-5 reports were filed for 2019 and are late filed. The reports identified expenditures to Southwest WA Electricians PAC 48 of WA for: \$10,402.15 on January 22, 2019; \$10,562.58 on February 21, 2019; \$9,443.32 on March 14, 2019; \$9,890.63 on April 11, 2019; \$11,739.11 on May 7, 2019; \$10,217.72 on June 26, 2019; \$50,000 on July 3, 2019; \$32,124.85 on September 6, 2019; and \$11,828.06 on October 14, 2019.

The Local 48 Electricians PAC would like to avoid the time and expense of a Brief Adjudicative Proceeding (Brief Enforcement Hearing). Therefore, in lieu of a hearing, the Local 48 Electricians PAC acknowledges that it violated Washington State law as described above and agrees to enter this *Statement of Understanding* (SOU) to resolve the above matter with the Public Disclosure Commission (PDC).

In accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143, The Local 48 Electricians PAC agrees to pay a \$750 penalty for an acknowledged violation of RCW 42.17A.250 for failing to timely and accurately report as an out-of-state political committee in years 2019, 2020, 2021, 2022, 2023, and 2024.

The Local 48 Electricians PAC understands that, by signing this SOU, it acknowledges the violation of Chapter 42.17A RCW and Title 390 WAC set forth above and waives its right to a hearing in this matter. The Local 48 Electricians PAC further understands that signing this SOU and returning it to the PDC with a payment for the \$750 civil penalty will resolve the issue of failing to timely and accurately report as an out-of-state political committee in years 2019, 2020, 2021, 2022, 2023 & 2024.


Garth Bachman
Business Manager


Date Signed

The signed Statement of Understanding (SOU) and \$750 penalty payment is due by **November 26, 2024**. See the options below for how to continue with either online, by mail, or in-person processing.

Electronic Payment Option

Please be aware, processing fees may apply. To start the process for making an online payment, do the following:

Email an electronic copy of the signed SOU to the Compliance Officer assigned to your case.

- A photo or scan of the signed SOU is acceptable. Do make sure that all parts of the SOU are within focus and readable.
- To email the signed SOU to your Compliance Officer, reply directly to the last email you had with the Compliance Officer and attach the document.
- The Compliance Officer must receive the signed SOU no later than **Thursday, November 21, 2024**.
 - A signed SOU is required for the terms of the agreement to be fulfilled.
 - If we do not receive the SOU, your case will be scheduled for the next available Brief Adjudicative Proceeding (BAP). If this occurs, the Commission's Presiding Officer will hear the case.
 - If you send the SOU and payment electronically, you DO NOT need to mail a hard copy of the SOU to your Compliance Officer

Once the SOU is received, PDC staff will email a payment link and further instructions about how to make a payment.

- You must send the payment, via the link, no later than **November 26, 2024**.

Mail or In-Person Payment Option

To pay by check or money order, make the payment payable to "Washington State Treasurer," write your PDC Case Number in the Memo field, and mail or deliver the payment **and your signed SOU** to one of the addresses listed below, no later than **November 26, 2024**.

Regular mail:

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

Overnight mail or in-person delivery:

Public Disclosure Commission
711 Capitol Way S, STE 206
Olympia, WA 98501-1267