



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way, Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • Fax (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

**Public Disclosure Commission Statement of Understanding
Washington Optometric Physicians Political Action Committee
PDC Case 159776**

I, Sarah Storrs, in my capacity as Chair of the Washington Optometric Physicians Political Action Committee (the Committee), hereby acknowledge that, in the years of 2020, 2021, 2022, 2023, and 2024 the Committee violated RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately file Cash Receipts, Monetary Contributions (C-3) reports and Receipts & Expenditure Summary (C-4) reports.

The facts are as follows:

- Under RCW 42.17A.235 and .240, under the Full Reporting option, a committee is required to disclose contribution and expenditure information by submitting Receipts and Expenditure Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3) reports to the PDC. The Committee's due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.
- The Committee filed a Committee Registration (C-1pc) on January 1, 2012, under the Full Reporting option, as a continuing committee.
- The first C-4 report filed by the Committee in 2022 did not show the correct carry-forward balance from the 2021 calendar year, which caused errors throughout the 2022 reporting and resulted in a negative Cash on Hand balance on the last C-4 report filed in 2022. On December 5, 2024, the Committee fixed the errors in the 2022 reporting by amending multiple C-4 reports. Similarly, for 2023 and 2024, C-4 reports were amended to reflect correct carry-forward balances.

- In 2020 and 2021 the Committee did not show a consistent record of timely reporting. However, in 2022, the Committee came into substantial compliance with its C-3 and C-4 reporting requirements for 2020 and 2021.
- In 2022, the Committee filed its January C-4 report two months late and its February C-4 report was five days late.
- On April 11, 2023, the Committee filed a combined January – April C-4 report showing a level of contribution activity requiring separate months' filings. This reporting method effectively made the January and February reports untimely. Additionally, the Committee filed its report for the period of April 18 – 30, 2023 one month late, and also filed its report for the period of July 12 – 24, 2023 one month late.
- In 2024, the Committee filed its C-4 reports for January, June, and August one month late.
- In 2021, 2022, and 2024 the Committee participated in the elections, by contributing to campaigns, but failed to comply with the C-4 reporting schedule requiring filing 21-days and 7-days before an election. The Committee also failed to comply with the C-4 post-election reporting period. The Committee also did not convert from monthly reporting to the required weekly C-3 reporting when there was applicable contribution activity.
- Late reporting and incorrect information submitted across years deprived the public of accurate information prior to elections in which the Committee participated.

The Committee would like to avoid the time and expense of a Brief Adjudicative Proceeding (Brief Enforcement Hearing). Therefore, in lieu of a hearing, the Committee 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, Washington Optometric Physicians Political Action

Committee agrees to pay a \$300 penalty for acknowledged violations of RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately file Cash Receipts, Monetary Contributions (C-3) reports and Receipts & Expenditure Summary (C-4) reports in the years of 2020, 2021, 2022, 2023 and 2024.

Washington Optometric Physicians Political Action Committee understands that, by signing this SOU, it acknowledges the violations of Chapter 42.17A RCW and Title 390 WAC set forth above and waives its right to a hearing in this matter. Washington Optometric Physicians Political Action Committee further understands that signing this SOU and returning it to the PDC with a payment for the \$300 civil penalty will resolve the issue of failing to timely and accurately file Cash Receipts, Monetary Contributions (C-3) reports and Receipts & Expenditure Summary (C-4) reports in the years of 2020, 2021, 2022, 2023 and 2024, indicated above.



Sarah Storrs
Chair

12/16/2024
Date Signed