

**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

In the Matter of Enforcement Action
Against:

SEIU Healthcare 1199 NW PAC,

Respondent.

Case No. 163092

STIPULATION AS TO
FACTS, VIOLATIONS, AND
PENALTY

The parties to this Stipulation, namely, the Public Disclosure Commission Staff, through its Executive Director, Peter Frey Lavallee, and Respondent, SEIU Healthcare 1199 NW PAC, through its General Counsel, Carson Flora, submit this Stipulation as to Facts, Violations, and Penalty in this matter. In lieu of a contested hearing, the parties jointly present this stipulation to the Commission for its review and approval. The parties agree that the Commission has the authority to accept, reject, or modify the terms of this Stipulation. The parties further agree that in the event the Commission suggests modification to any term of this agreement, each party reserves the right to reject that modification. In the event either party rejects a modification, this matter will proceed to hearing before the Commission.

JURISDICTION

The Public Disclosure Commission has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC.

FACTS

1. SEIU Healthcare 1199 NW PAC (the Committee) is a continuing political committee that has been registered with the PDC since at least 2008. The PAC is associated with SEIU Healthcare 1199 NW Union, which according to its website is part of “the largest union of healthcare workers in the nation.”

2. The Committee received cash and in-kind contributions totaling \$1,355,699.22 during the 2024 election year and reported \$613,845.90 in expenditures. The Committee's treasurer for 2024 was listed on its PDC registration as Yolanda King-Lowe.
3. On Nov. 27, 2024, a complaint was filed with the PDC alleging the Committee failed to file the required C-4 reports due 21 and 7 days prior to the November 2024 election. Committee Finance Director Han Nguyen promptly answered the complaint and worked with PDC Staff to resolve the issue.

Late Reporting

4. Campaign Summary Receipts and Expenditures (C-4) report filed October 2, 2024. The Committee participated in the 2024 General Election, making its first contribution on Sept. 16, 2024 to a candidate participating in that election.
5. Campaign Summary Receipts and Expenditures (C-4) Report filed November 11, 2024. This report was the tenth C-4 report filed by the Committee during the 2024 election year, listing five expenditures totaling \$432,400. Of these expenditures, three were listed as being paid October 3, 2024, and two were listed as being paid October 21, 2024.
 - a. The three listed as being made October 3, 2024, were required to be reported by October 15, 2024, but were not reported until November 11, 2024 – 28 days late and 7 days after the 2024 General Election.
 - b. The two listed as being made October 21, 2024, were required to be reported by October 29, 2024, but were not reported until November 11, 2024 – 14 days late and 7 days after the 2024 General Election.
6. Campaign Summary Receipts and Expenditures (C-4) Report filed December 8, 2024. During its investigation, PDC Staff also noted a C-4 report filed December 8, 2024 relating to the 2024 general election. This report was the eleventh C-4 report filed by the Committee during the

2024 election year, listing a \$2,400 expenditure to “Elect Upthegrove” paid on November 1, 2024. The report was filed 36 days late and 33 days after the 2024 General Election.

Mitigating Factors

7. There is no evidence that the Committee’s failure to timely report contributions or expenditures during the month before the election was done intentionally.
8. Finance Director Han Nguyen answered the PDC complaint promptly and acknowledged the violation once notified.

Aggravating Factors

9. The Committee is a continuing political committee that has been registered with the PDC since at least 2008.
10. Han Nguyen previously filed C-4 reports within the 21- and 7-day pre-general election statutory timeframe in 2022, meaning they knew or should have known that the same filing requirement applied to the 2024 general election.

VIOLATIONS

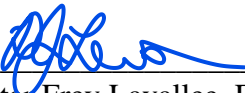
Based on the Stipulation of Facts set forth above, the Committee stipulates to the following violations:

- a. RCW 42.17A.235 and 42.17A.240 by failing to timely report five expenditures totaling \$432,400 on a 7-day pre-General C-4 report, reporting the expenditures between 28 and 14 days late, and 7 days after the 2024 General Election.
- b. RCW 42.17A.265 by failing to timely report a \$2,400 expenditure paid on Nov. 1, 2024. The report was filed 36 days late and 33 days after the 2024 General Election.

PENALTY

Based on the Stipulation of Facts and Violations set forth above, the parties agree on the following monetary penalty:

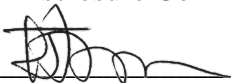
- An aggregate civil penalty of \$6,000 for all the violations combined, with \$3,000 suspended on the following conditions:
 - 1) The non-suspended portion (\$3,000 of the \$6,000 total monetary penalty) is paid by the Committee within 30 days of the date of this Final Order.
 - 2) The Committee remains in full compliance with all PDC reporting requirements and is not found to have committed any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this Final 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.
- If the Committee fails to satisfy the above conditions, the suspended portion of the penalty shall immediately become due, and the matter may be sent to collections or enforced in Superior Court as allowed by law without further action by the Commission.



Peter Frey Lavalley, Executive Director
Public Disclosure Commission

05/19/2025

Date Signed



Jane Hopkins, RN, President
SEIU Healthcare 1199 NW PAC

5/15/2025

Date Signed