



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action
Against

Green Jobs PAC

Respondent.

PDC Case 163094

Notice of Administrative Charges

I. JURISDICTION

The Public Disclosure Commission (PDC) 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.

II. ALLEGATION(S)

PDC Staff alleges that, during election year 2024, Respondent Green Jobs PAC violated RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-205, and WAC 390-16-037 by: (1) failing to timely file the 7-day Pre-General Election C-4 report covering October 15–28, 2024; (2) failing to disclose detailed information regarding subvendors used for campaign expenditures; and (3) failing failed to identify the specific ballot measure opposed by each expenditure on its C-4 reports.

III. FACTS

1. On January 29, 2024, Green Jobs PAC (the Committee) registered with the PDC for election year 2024. The Committee's Committee Registration report (C-1pc) was amended on March 27, 2024, disclosing opposition to statewide initiative I-2117. During election year 2024, the Committee received and spent \$3,170,890 in total.
2. The Committee submitted monthly C-4 reports for January 29 through August 31, 2024, a 21-day pre-general C-4 report covering September 1 to October 14, 2024, a 7-day

pre-general C-4 report covering October 15 to October 28, 2024, a post-general C-4 report covering October 29 to November 30, 2024, and a monthly report for December 1 to December 31, 2024.

Late Filing of the 7-Day Pre-General C-4 Report (Allegation 1)

3. 7-day Pre-General C-4 Report, 10/15/24–10/28/24, filed 11/13/24 (Report #110260255)
This report was required to be filed by October 29, 2024. The C-4 report disclosed \$5,025 in contributions received and \$1,073,669.17 in total expenditures made. The C-4 report was filed 15 days late, on November 13, 2024 (eight days after the election), and accounted for 36.9% of the total expenditures made by the Committee as of October 28, 2024. (Report #110260255)

Failure to Provide Subvendor Breakdown (Allegation 2)

4. The Committee timely submitted the 21-day pre-general C-4 report on October 15, 2024; however, the expenditures did not include the required subvendor information. (Report #110252566) The C-4 report was amended 62 days later on December 16, 2024, to add the missing information. (Report #110264772)
5. The Committee submitted the 7-day pre-general C-4 report late on November 13, 2024, and the expenditures did not include the required subvendor information. (Report #110260255) The C-4 report was amended 48 days later, on December 16, 2024, to add the missing information. (Report #110264773)

Failure to Identify the Ballot Measure Opposed by Committee Expenditures (Allegation 3)

6. The Committee submitted six original C-4 reports including: (1) a report covering June 1 to June 30, 2024, submitted on July 10, 2024 (Report #110228233); (2) a report covering July 1 to July 31, 2024, submitted on August 15, 2024 (Report #110238461); (3) a report covering August 1 to August 31, 2024, submitted on September 10, 2024 (Report #110244002); (4) a report covering September 1 to October 14, 2024, submitted on October 15, 2024 (Report #110252566); (5) a report covering October 15 to October 28, 2024, submitted on November 13, 2024 (Report #110260255); and (6) a report covering October 29 to November 30, 2024, submitted on December 10, 2024

(Report #110263627). None of the expenditures disclosed on these six C-4 reports identified the ballot measure opposed by the Committee.

7. On December 16, 2024, the Committee submitted six amended C-4 reports identifying its opposition to I-2117 on each expenditure, including (1) a report covering June 1 to June 30, 2024¹, submitted 159 days late (Report #110264767*)²; (2) a report covering July 1 to July 31, 2024, submitted 126 days late (Report #110264775*); (3) a report covering August 1 to August 31, 2024, submitted 97 days late (Report #110264768*); (4) a report covering September 1 to October 14, 2024, submitted 62 days late (Report #110264772*); (5) a report covering October 15 to October 28, 2024, submitted 48 days late (Report #110264773*); and (6) a report covering October 29 to November 30, 2024, submitted six days late (Report #110264774*).

Table of C-4 Reports Filed (Originals & Amendments)

ORIGINAL REPORT #	DATES COVERED	ORIGINAL DUE DATE	FILED DATE (ORIGINAL)	DAYS LATE	AMENDED REPORT #	FILED DATE (AMENDMENT)
110208999	1/29/2024-3/31/2024	04/10/2024	04/10/2024	0	110216088	05/20/2024
110214564	4/1/2024-4/30/2024	05/10/2024	05/10/2024	0	110216089	05/20/2024
110221777	5/1/2024-5/31/2024	06/10/2024	06/10/2024	0	N/A	N/A
110228233	6/1/2024-6/30/2024	07/10/2024	07/10/2024	0	110264767*	12/16/2024
110238461	7/1/2024-7/31/2024	08/12/2024	08/15/2024	3	110264775*	12/16/2024
110244002	8/1/2024-8/31/2024	09/10/2024	09/10/2024	0	110264768*	12/16/2024
110252566	9/1/2024-10/14/2024	10/15/2024	10/15/2024	0	110264772*	12/16/2024
110260255	10/15/2024-10/28/2024	10/29/2024	11/13/2024	15	110264773*	12/16/2024
110263627	10/29/2024-11/30/2024	12/10/2024	12/10/2024	0	110264774*	12/16/2024
110267064	12/1/2024-12/31/2024	01/10/2024	01/09/2025	0	N/A	N/A

¹Effective June 24, 2024, WAC 390-16-037(1) required the “purpose” of an expenditure under RCW 42.17A.240(6) to identify the ballot measure supported or opposed by the expenditure.

²An asterisk denotes an amended report.

IV. LAW AND RULES

RCW 42.17A.225, .235, and .240 require candidates, political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures. This includes in-kind contributions/expenditures and the name and address of each person who has made one or more contributions during the period, together with the money or in-kind value, the date of each contribution, and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with certain exceptions. In-kind contributions must include a detailed description of the contribution, including the name and address of vendors where contributed goods or services were purchased, and if applicable, the same information for subvendors used by vendors.

Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$750 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time period and must be disclosed on Mondays for contributions deposited during the previous seven days.

WAC 390-16-037(1) requires that any person required to report the “purpose” of an expenditure under **RCW 42.17A.240(6)**, or **42.14A.25(5)(b)**, must identify any candidate(s) or ballot proposition(s) that are supported or opposed by the expenditure as required to be filed under **RCW 42.17A.205(2)(f)** and **(g)**.

WAC 390-16-205 requires, in relevant part, that:

(1) Expenditures made on behalf of a candidate or political committee by any person, agency, consultant, firm, organization, etc., employed or retained for the purpose of organizing, directing,

managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with WAC 390-16-037, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

(2) If any person, agency, consultant, firm, organization, etc., employed or retained by the candidate or political committee subcontracts or otherwise has an agreement with a subvendor or other third party to provide or perform services, the expenditures paid to that subvendor or other third party must also be disclosed.

(3) Fees paid to consultants or other agents must be disclosed by candidates or political committees as an expenditure. In addition, when subvendors are used, the candidate or political committee must disclose any portion of the expenditure retained by the consultant or other agent.

RESPECTFULLY SUBMITTED this 20th day of May 2025.

Electronically Signed Peter Frey Lavallee
Peter Frey Lavallee
Executive Director