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7 **BEFORE THE PUBLIC DISCLOSURE COMMISSION**  
8 **OF THE STATE OF WASHINGTON**  
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10 In re the Matter of Enforcement Action  
11 Against:

PDC CASE NO. 163094

12 GREEN JOBS PAC,

FINAL ORDER

13 Respondent.  
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16 **I. INTRODUCTION**  
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18 This matter was heard remotely by the Washington State Public Disclosure Commission  
19 (PDC, Commission) on June 26, 2025, by audio and online streaming. The hearing was held  
20 pursuant to Chapter 34.05 RCW, Chapter 42.17A RCW, and Chapter 390-37 WAC.

21 Commissioners present on-line were J. Robert Leach, Commission Chair (presiding);  
22 Douglass North, Commission Vice-Chair; and Commissioners Nancy Isserlis and James  
23 Oswald. Also present online were Assistant Attorney General John S. Meader representing the  
24 Commission; Assistant Attorney General Susie Giles-Klein representing PDC staff; and Jennifer  
25 Hansen, Compliance Officer, for PDC Staff. Green Jobs PAC was represented by its counsel,  
26 Dmitri Iglitzin, of Barnard, Iglitzin, & Lavitt, LLP. The proceeding was open to the public and

1 recorded.

2 The hearing concerned allegations that the Respondent violated RCW 42.17A.235 and  
3 .240 for failure to timely disclose \$5,025 in contributions and \$1,073,669.17 in total expenditures  
4 on a 7-day Pre-General C-4 report, submitted 15 days late on November 13, 2024, after the 2024  
5 General Election. The Respondent is also alleged to have violated RCW 42.17A.235 and .240  
6 and WAC 390-16-205 by failing to timely disclose the required subvendor information on the  
7 21-day Pre-General C-4 report and the 7-day Pre-General C-4 report. The Respondent further  
8 violated RCW 42.17A.235 and .240 and WAC 390-16-037(1) by failing to timely disclose the  
9 specific ballot measure opposed by each expenditure made by the Committee during the 2024  
10 election including all but one in-kind contribution during the month of June 2024, and  
11 expenditures made in July, August, September, October, and November, 2024.

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13 The Commissioners had before them the following materials:

- 14 • Notice of Administrative charges, PDC Case No. 163094, dated May 20, 2025,  
15 and signed by Executive Director Peter Lavallee;
- 16 • Report of Investigation for Case 163094, prepared by Jennifer Hansen,  
17 Compliance Officer, dated May 20, 2025, which included:
  - 18 ○ Complaint filed by Callie Castillo on November 27, 2024;
  - 19 ○ Response to complaint received on December 17, 2024;
  - 20 ○ Original 7-day Pre-General C-4 Report, 10/15/24-10/28/24, filed  
21 11/13/24 (Report #110260255);
  - 22 ○ Original 21-day Pre-General C-4 Report, 9/1/24-10/14/24, filed 10/15/24  
23 (Report 110252566);
  - 24 ○ Amended 21-day Pre-General C-4 Report, 9/1/24-10/14/24, filed  
25 12/16/24 (Report 110264772);
  - 26 ○ Amended 7-day Pre-General C-4 Report, 10/14/24-10/28/24, filed

- 12/16/24 (Report 110264773);
- June C-4 Report, 6/1/24-6/30/24, original filed 7/10/24 (Report 110228233), amended 12/16/24 (Report 110264767);
  - July C-4 Report, 7/1/24-7/31/24, filed 8/15/24 (Report 110238461), amended 12/16/24 (Report 110264775);
  - August C-4 Report, 8/1/24-8/31/24, filed 9/10/24 (Report 110244002), amended 12/16/24 (Report 110264768);
  - Post General C-4 Report, 10/29/24-11/30/24, filed 12/10/24 (Report 110263627), amended 12/16/24 (Report 110264774).
- Proposed Stipulation as to Facts, Violations, and Penalties submitted by the parties and signed on June 5, 2025, by Isaac Kastama, Committee Officer for Green Jobs PAC, and on June 6, 2025, by Peter Lavallee, Executive Director for the PDC.

## II. STIPULATION

The parties jointly submitted a signed Stipulation as to Facts, Violations, and Penalties (Stipulation). Ms. Giles-Klein presented the Stipulation, reviewed the aggravating and mitigating factors, summarized the penalties recommended by PDC Staff, and asked the Commission to accept the Stipulation. Mr. Iglitzin was available for questions and confirmed the information provided by Ms. Giles-Klein. The Respondent took responsibility and asked the Commission to accept the Stipulation. The Commission voted 4-0 to accept the Stipulation as submitted.

## III. FINDINGS OF FACT

1. The Respondent, Green Jobs PAC, is a political action committee registered with the PDC. The Committee was created to oppose 2024 Washington Initiative 2117, the Prohibit

1 Carbon Tax Trading Initiative. During election year 2024, the Committee received and spent  
2 \$3,170,890 in total. Respondent has no prior violations with the PDC.

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4 2. The Respondent submitted monthly C-4 reports for January 29 through August 31,  
5 2024, a 21-day pre-general C-4 report covering September 1 to October 14, 2024; a 7-day Pre-  
6 General C-4 report covering October 15 to October 28, 2024; a Post-General C-4 report covering  
7 October 29 to November 30, 2024; and a monthly report for December 1 to December 31, 2024.

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9 3. A Complaint dated November 27, 2024, was filed with the PDC alleging the  
10 Respondent failed to 1) file its 7-day Pre-General C-4 report on October 29, 2024, and did not  
11 submit it until November 13, 2024; 2) failed to disclose detailed information regarding  
12 subvendors used for campaign expenditures; and 3) failed to identify the specific ballot measure  
13 opposed by each expenditure on its C-4 reports. The details of the reports are described on pages  
14 2-3 of the stipulation (sections 4-9) and are incorporated by reference into this order.

#### 15 16 **IV. CONCLUSIONS OF LAW**

17 1. The Commission has jurisdiction over this proceeding pursuant to Chapter 42.17A  
18 RCW, the state campaign finance and disclosure law; Chapter 34.05 RCW, the Administrative  
19 Procedure Act; and Title 390 WAC.

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21 2. Pursuant to RCW 42.17A.235 and .240, Respondent failed to timely report \$5,025  
22 in contributions and \$1,074,669.17 in total expenditures on its 7-day pre-General C-4 report,  
23 reporting the expenditures 15 days late on November 13, 2024, after the 2024 General Election.  
24 This report accounted for 36.9% of the total expenditures made by the Committee as of October  
25 28, 2024.

1           3.       Pursuant to RCW 42.17A.235 and .240, and WAC 390-16-205, the Respondent  
2 timely submitted the 21-day Pre-General C-4 report on October 15, 2024, but the expenditures  
3 did not include the required subvendor information. The C-4 report was amended 62 days later  
4 on December 16, 2024, to add the missing information.

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6           4.       The Respondent submitted six original C-4 reports between June 1, 2024, and  
7 December 10, 2024, which violated RCW 42.17A.235 and .240, and WAC 390-16-037(1) and  
8 did not identify the ballot measure opposed by the Committee. On December 16, 2024, the  
9 Respondent submitted six amended C-4 reports that included the missing information.

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11           5.       Mitigating factors in this case are: there is no evidence presented to the  
12 Commission that Respondent's failure to timely report contributions or expenditures, or to  
13 omit campaign activity information, was intentional; the Respondent promptly answered  
14 the complaint and made all necessary amendments without issue; and, although insufficient to  
15 constitute compliance with the law, the Respondent listed its purpose on its C-1pc as  
16 opposition to I-2117 which mitigated the public impact of its failure to add that information to  
17 the other reports.

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19           6.       Aggravating factors in this case are: the Respondent was successful in its  
20 opposition to I-2117, thus its failure to submit its 7-day Pre-General C-4 report until after the  
21 2024 General Election significantly deprived the public of timely or accurate information  
22 during a time sensitive period; and the monetary total of late-disclosed expenditures was  
23 significant, amounting to \$1,073,669.17, or 36.9% of the Committee's total expenditures as of  
24 October 28, 2024.

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**V. ORDER**

Based upon the stipulated Findings of Fact and the Commission's Conclusions of Law, the Commission accepts the agreed Stipulation of the parties as to Facts, Violations, and Penalties and orders that:

1. The Respondent pay an aggregate civil penalty of \$20,000 for all the violations with \$10,000 suspended on the following conditions:
  - a. The non-suspended portion of the penalty (\$10,000) is paid by the Respondent within 30 days of the date of the Final Order.
  - b. If the Respondent fails to make timely payment of the non-suspended portion of the penalty, the total civil penalty of \$20,000 shall immediately become due and the matter may be sent to collection or brought to Superior Court as allowed by law without further action by the Commission.
  - c. The Respondent 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.

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1 So ORDERED this \_\_\_\_ day of July, 2025.

2 WASHINGTON STATE PUBLIC  
3 DISCLOSURE COMMISSION

4 FOR THE COMMISSION:

5 J. Robert Leach

J. Robert Leach (Jul 1, 2025 09:37 PDT)

6 J. Robert Leach,  
Chair, Public Disclosure Commission

7 *Copy of this Order mailed and/or emailed to:*

8 Dmitri Iglitzin, Barnard, Iglitzin, & Lavitt, LLP, Counsel for Green Jobs PAC,  
9 [iglitzin@workerlaw.com](mailto:iglitzin@workerlaw.com)

10 Jennifer Hansen, PDC Compliance Officer, [Jennifer.hansen@pdc.wa.gov](mailto:Jennifer.hansen@pdc.wa.gov).

11 Susie Giles-Klein, Assistant Attorney General, Counsel for PDC Staff, [Susie.giles-klein@atg.wa.gov](mailto:Susie.giles-klein@atg.wa.gov).

12  
13 I, Jennifer Hansen, certify that I mailed and/or emailed a copy of this order to the  
14 Respondent/ Applicant at his/her respective address postage pre-paid on the date stated  
15 herein.

16 Jennifer Hansen

Jennifer Hansen (Jul 1, 2025 09:49 PDT)

17 Signed

Date

18 **NOTICE: RECONSIDERATION**

19 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a Petition for  
20 Reconsideration with the PDC within ten (10) days from the date this Final Order is served upon  
21 you. Any Request for reconsideration must state the specific grounds for the relief requested.  
22 Petitions must be electronically mailed to the Washington State Public Disclosure Commission,  
711 Capitol Way, Room 206, Box 40908, Olympia WA 98504-0908, [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

23 **NOTICE: PETITION FOR JUDICIAL REVIEW**

24 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for  
25 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final  
26 Order must be filed with the court and also served upon both the Commission and the Office of  
the Attorney general within thirty (30) days after the date this Final Order is served upon you.