

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

In the Matter of Enforcement Action
Against:

Green Jobs PAC,

Respondent.

Case No. 163094

STIPULATION AS TO
FACTS, VIOLATIONS, AND
PENALTY

The parties to this Stipulation, namely, the Public Disclosure Commission Staff, through its Executive Director, Peter Frey Lavalley, and Respondent, Green Jobs PAC, through its Counsel, Dmitri Iglitzin, 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 (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.

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.
3. On November 27, 2024, a complaint was filed alleging the Committee violated the Fair Campaign Practices Act, RCW 42.17A. Specifically, the complaint alleged: (1) the Committee was required to submit its 7-day Pre-General C-4 report on October 29, 2024, but did not submit it until November 13, 2024; (2) the Committee failed to disclose detailed information regarding subvendors used for campaign expenditures; and (3) the Committee failed to identify the specific ballot measure opposed by each expenditure on its C-4 reports.

Late Reporting of the 7-day Pre-General C-4 Report (Allegation 1)

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

Failure to Provide Subvendor Breakdown (Allegation 2)

6. The Committee timely submitted the 21-day Pre-General C-4 report on October 15, 2024, but the expenditures did not include the required subvendor information. The C-4 report was amended 62 days later on December 16, 2024, to add the missing information.

7. The Committee submitted the 7-day Pre-General C-4 report late on November 13, 2024. However, the expenditures did not include the required subvendor information. The C-4 report was amended 48 days later, on December 16, 2024, to add the missing information.

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

8. The Committee submitted six original C-4 reports including: (1) a report covering June 1 to June 30, 2024, submitted on July 10, 2024; (2) a report covering July 1 to July 31, 2024, submitted on August 15, 2024; (3) a report covering August 1 to August 31, 2024, submitted on September 10, 2024; (4) a report covering September 1 to October 14, 2024, submitted on October 15, 2024; (5) a report covering October 15 to October 28, 2024, submitted on November 13, 2024; and (6) a report covering October 29 to November 30, 2024, submitted on December 10, 2024. None of the expenditures disclosed on these six C-4 reports identified the ballot measure opposed by the Committee.
9. On December 16, 2024, the Committee submitted six C-4 reports amending the C-4 reports identified above. These reports were amended to include the Committee's opposition to I-2117 on each expenditure. These reports were amended between 6 and 159 days after they were originally due.

Mitigating Factors

10. There is no evidence that the Committee's failure to timely report and/or accurately disclose campaign activity during the 2024 election cycle was done intentionally.
11. The Committee answered the PDC complaint promptly and made all necessary amendments without issue.
12. Although insufficient to constitute compliance with the law, the Committee's listing of opposition to I-2117 as its purpose on its C-1pc mitigated the public impact of the Committee's failure to report the purpose of each expenditure on its above-referenced C-4 reports.

Aggravating Factors

13. The Committee was successful in its opposition to I-2117. Thus, the Committee's failure to submit its 7-day Pre-General C-4 report until after the 2024 General Election significantly deprived the public of timely or accurate information during a time-sensitive period.
14. The monetary total of late-disclosed expenditures was significant, amounting to \$1,073,669.17, or 36.9% of the Committee's total expenditures as of October 28, 2024.

VIOLATIONS


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

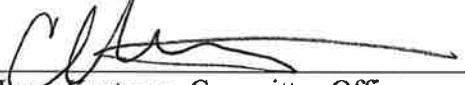
- a. RCW 42.17A.235 and 42.17A.240 by failing to timely disclose \$5,025 in contributions and \$1,073,669.17 in total expenditures on a 7-day Pre-General C-4 report, submitted 15 days late, on November 13, 2024, after the 2024 General Election.
- b. RCW 42.17A.235, RCW 42.17.240, and WAC 390-16-205 by failing to timely disclose the required subvendor information on the 21-day Pre-General C-4 report and the 7-day Pre-General C-4 report. The C-4 reports were amended after the 2024 General Election, 62 and 48 days late, respectively.
- c. RCW 42.17A.235, RCW 42.17A.240, and WAC 390-16-037(1) by failing to timely disclose the specific ballot measure opposed by each expenditure made by the Committee during the 2024 election including all but one in-kind contribution during the month of June 2024 and expenditures made in July, August, September, October, and November 2024. The reports were amended after the 2024 General Election, between 6 and 159 days late.

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 \$20,000 for all the violations combined, with \$10,000 suspended on the following conditions:
 - 1) The non-suspended portion (\$10,000 of the \$20,000 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


Isaac Kastama, Committee Officer
Green Jobs PAC

06/06/2025
Date Signed

6/5/25
Date Signed

