



State of Washington
PUBLIC DISCLOSURE COMMISSION

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June 13, 2025

Delivered electronically to superintendent@nsd.org & thc@pattersonbuchanan.com

Subject: PDC Case 163458 regarding Northshore School District Officials

Superintendent Michael Tolley and Counsel Timothy H. Campbell:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Bob Brown on November 22, 2024. The complaint alleged violations of RCW 42.17A.555 for improper use of public facilities or resources to support or oppose a ballot measure in election year 2024.

Applicable Laws and Rules

[RCW 42.17A.555](#) prohibits the use of public agency facilities, directly or indirectly, for the promotion of or opposition to any ballot proposition.

[PDC Interpretation No. 01-03 Guidelines for School Districts](#) describes permissible activities of a publicly funded entity including the right of individuals to express their own personal views regarding a ballot proposition, if such expression does not involve the use of the district facilities. In addition, it is permissible for a public entity to make its facilities available on a nondiscriminatory, equal access basis for political uses.

Background and Findings

- The Northshore School District (the District) is located in Bothell, Washington. The school board consists of five members. Michael Tolley is the current superintendent.
- The complaint alleged that the District held a Special Meeting (Town Hall) on October 15, 2024, on district property to discuss opposing statewide ballot measure I-2109 (regarding the Capital Gains Tax) but failed to provide equal opportunity for those supporting the initiative to speak. In addition, the complaint included photographs of “No I-2109” signs on the grounds and No I-2109 literature placed inside the venue during the event.
- In his response on behalf of the District, legal counsel Timothy Campbell explained that the Town Hall meeting was requested by Representative Davina Duerr to be an informational session with community members regarding I-2109. Mr. Campbell confirmed the District made the meeting space available for this purpose according to its normal and regular scheduling practice used for community events, stating the District does not charge any fees for legislative

events. Regarding the No I-2109 signs and materials, Mr. Campbell confirmed these were brought by attendees of the event and removed after the Town Hall had adjourned.

Summary and Resolution

It appears that the District acted in good faith when determining what type of event Rep. Duerr was planning for October 15, 2024, believing it was a legislative event. The District followed its normal practice and did not charge a fee as would have been the case had it been treated as a campaign event instead. Staff found no evidence that the District purposely violated RCW 42.17A.555.

You completed a Statement of Understanding (SOU) in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.555 by authorizing the use of district facilities for the purpose of opposing ballot measure I-2109. The signed SOU resolves the allegations listed in this case.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Jennifer Hansen at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Jennifer Hansen
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Bob Brown