

State of Washington PUBLIC DISCLOSURE COMMISSION

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March 5, 2025

Delivered electronically to chaszarj@gmail.com

Subject: PDC Case 165707 regarding Citizens for Better Schools Oak Harbor

Citizens for Better Schools Oak Harbor:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on January 2, 2025, and February 5, 2025. The complaints alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately report expenditures.

Applicable Laws and Rules

- <u>RCW 42.17A.235</u> describes the required filing deadlines for disclosure of campaign finance activities.
- <u>RCW 42.17A.240</u> requires committees to file accurate campaign finance reports with the PDC.

Background and Findings

- Citizens for Better Schools Oak Harbor is a political committee that supported school levies in the Oak Harbor School District in 2022, 2023, and 2025.
- The January 2, 2025, complaint alleged discrepancies in the carry-forward balances of the 2023 and 2025 campaigns, late-filed *Campaign Summary Receipts & Expenditures* reports (C-4 reports) for the 2022, 2023, and 2025 campaigns, and a lack of required expenditure details in C-4 reports for the 2023 and 2025 campaigns.
- The February 5, 2025, complaint alleged the failure to file the mandatory 7-day pre-election C-4 report.
- PDC staff additionally identified a missing *Cash Receipts Monetary Contributions* report (C-3 report) for the 2025 campaign based on a contribution reported in the committee's 21-day preelection C-4 report.
- In response to the complaints, Citizens for Better Schools Oak Harbor Treasurer John Chaszar explained that the carry-forward balance discrepancy for the 2025 campaign resulted from a late 2023 reimbursement for a website fee paid to a campaign volunteer after closing out the 2023 campaign but before registering the 2025 campaign committee.
- On January 25, 2025, Citizens for Better Schools Oak Harbor late-filed the missing C-3 report.

- Upon receiving guidance from PDC staff to prioritize corrections to 2025 campaign reporting, Citizens for Better Schools Oak Harbor on February 6, 2025, amended the start date of the 2025 campaign to the date of the 2023 reimbursement, late-filed the required monthly C-4 reports, and amended existing C-4 reports to reflect the correct balance.
- On February 6, 2025, Citizens for Better Schools Oak Harbor also late-filed the missing 7-day pre-election C-4 report.
- On February 23, 2025, Citizens for Better Schools Oak Harbor amended the campaign's 2025 C-4 reports to add required expenditure details.

Summary and Resolution

Noncompliance appears to be the result of a lack of understanding of PDC requirements rather than the intent to withhold information from public disclosure. Based on our findings, staff has determined that, in this instance, failure to timely and accurately report contributions and expenditures does not amount to a violation that warrants further investigation.

Pursuant to <u>WAC 390-37-060(1)(d)</u>, however, you are receiving a formal written warning concerning failure to timely and accurately disclose all contributions and expenditures. Staff expect that you timely file all future required reports of contributions and expenditures and include the required level of detail for campaign expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on guidance regarding current caseload levels the Commission issued at its January 23, 2025, meeting, this matter is being dismissed in accordance with <u>RCW 42.17A.755(1)</u>.

Any allegations regarding reporting by you for calendar years 2022, 2023, and the February 2025 special election that are not otherwise addressed are also hereby dismissed. However, PDC staff advise you to amend your 2022 and 2023 C-4 reports to address identified discrepancies and disclose required details. You also are required to comply with all PDC requirements in the future. Failure to do so could lead to further enforcement action

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

Sincerely,

<u>Electronically signed by Casey Gayman</u> Casey Gayman Compliance Officer Endorsed by,

<u>Electronically signed by Kim Bradford</u> Kim Bradford Deputy Director For Peter Frey Lavallee Executive Director

cc: Conner Edwards