

Elinor Engle

reported via email

(Wed, 12 Feb 2025 at 10:21 AM)

To:"PDC Support" <pdcc@pdcc.wa.gov>

Cc:cole@workerlaw.com, iglitzin@workerlaw.com

External Email

Good morning,

Please find attached SEIU 775 Ballot Fund's response to complaint number 166613.

Thank you,

Elinor Engle



**ELINOR ENGLE** | *Paralegal (she/her)* | Barnard Iglitzin & Lavitt LLP

**DIR:** 206.257.6031 | **FAX:** 206.378.4132

18 West Mercer Street, Suite 400, Seattle, WA 98119

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18 West Mercer Street, Suite 400  
Seattle, WA 98119  
TEL (800) 238.4231  
FAX (206) 378.4132

**Azor Cole**  
Associate Attorney  
DIR (206) 257-6009  
cole@workerlaw.com

*Original via email to:  
pdc@pdc.wa.gov*

February 12, 2025

Public Disclosure Commission  
711 Capitol Way S #206  
Olympia, WA 98504

Re: Complaint No. 166613  
BIL File No. 3263-356

Dear PDC Staff,

This letter constitutes SEIU 775 Ballot Fund's response to the allegations raised in Conner Edwards' February 6, 2025, complaint. The complaint alleges violations of RCW 42.17A.235 and .240 for failure to file a C-4 report 7 days ahead of the February 11, 2025, special election.

Several factors set out in WAC 390-37-061 make clear that an alternative response to an investigation or adjudicative proceeding is appropriate, such as a dismissal with a written reminder.

1. The noncompliance resulted from a good-faith error, omission, or misunderstanding. It was not an intentional effort to conceal, deceive, mislead, or violate the law.

SEIU 775 Ballot Fund is in the habit of filing monthly C-4 reports and regular C-3 reports, as needed. The complaint addresses one contribution specifically, a \$2,500 contribution made on 1/24/2025 to Raise The Wage Burien (RTWB) which, instead of being disclosed on February 4, 2025, in compliance with the Special Election timeline,<sup>1</sup> was disclosed on February 7, 2025, three days later.<sup>2</sup> This occurred as the result of a simple good-faith error; SEIU 775 Ballot Fund was not aware, on February 4, that the 7-day pre-election report requirement that applies to primary and general elections is also required with regard to special elections in which the political committee participates. Nothing about this was intentionally misleading. Full disclosure a mere three days later supports this.

2. There is no evidence that any person, including an entity or organization, benefited politically or economically from the noncompliance.

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<sup>1</sup> <https://www.pdc.wa.gov/sites/default/files/202412/special%20election%20key%20dates%202025%20copy.pdf>

<sup>2</sup> <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110270637>

SEIU 775 Ballot Fund in no way benefited, politically or economically, from reporting this contribution on its normal timeline instead of the alternate special election-specific timeline. And no evidence suggests any other person or entity benefited either.


3. The impact of the noncompliance on the public was minimal.

There was only a three-day gap in time between when SEIU 775 Ballot Fund should have disclosed this contribution and when it did. Further, this disclosure was made before the election occurred and was for only \$2,500.

In light of these considerations, SEIU 775 Ballot Fund requests that the PDC resolve this matter through a dismissal with a written reminder. The PDC has frequently resolved similar cases through an alternate response to a formal investigation and enforcement under RCW 41.17A.235 and .240 with a dismissal with a written reminder. *See, e.g.*, PDC Case No. 160723 (where PAC failed to follow 21- and 7-pre election filing deadlines and case was dismissed with reminder); PDC Case No. 160719 (same); PDC Case No. 160311 (same).

Please contact me with any questions or concerns at (206) 257-6009.

Sincerely,

A handwritten signature in cursive script, appearing to read "Azor Cole".

Azor Cole

*Counsel for SEIU 775 Ballot Fund*