



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

Memorandum

To: Public Disclosure Commission

From: Shelley Warnock, Compliance Officer

Date: September 25, 2025

Subject: Ellen Elizabeth Branch Enforcement Hearing Memorandum: PDC Case 173183

Allegations:

PDC staff alleges that Ellen Elizabeth Branch (Respondent), a candidate for School Director in Vashon School District 402, violated RCW 42.17A.205 by failing to file a Candidate Registration (C-1), due within 14 days of becoming a candidate or no later than May 23, 2025.

Background and Prior Violations:

- Respondent was most recently appointed School Board Director for Vashon School District on March 28, 2024, and declared their candidacy on May 9, 2025, for the 2025 election year.
- Between May 12 and May 27, 2025, PDC staff sent email reminders to all registered candidates regarding their missing C-1 report for election year 2025.
- On September 3, 2025, PDC staff mailed and emailed Respondent a hearing notice regarding the missing reports for election year 2025. This hearing notice was sent to Respondent's email and address of record. **(Exhibit 1)**
- As of September 17, 2025, Respondent has not filed their C-1 report for election year 2025.

First Violation (PDC Case 136923): (Exhibit 2)

- Respondent, a 2023, candidate for School Director in Vashon School District failed to file a C-1. The report was due no later than June 4, 2023.
- At an August 17, 2023, Brief Adjudicative Proceeding (Brief Enforcement Hearing), Respondent was found in violation of RCW 42.17A.205 and assessed a civil penalty of \$250 with \$100 suspended, provided the conditions of the order were met and there were no further violations for four years.
- To date, Respondent has not paid the outstanding \$250 civil penalty for case 136923.
- In addition, the missing C-1 report for election year 2023, has not been filed.

Staff Recommendation:

Staff recommends the Commission find that Respondent violated 42.17A.205 by failing to file timely a C-1 report for election year 2025, and:

1. Assess Respondent a civil penalty between \$0 and \$1000 for the outstanding 2025 election year C-1 report as laid out in WAC 390-37-182 the penalty schedule for a respondent on their second violation who did not file the report in question before the hearing, which is payable within 30 days of the date of the Order.
2. Require Respondent to file the missing C-1 report for election years 2023 and 2025 within 30 days of the date of the Order.

Attachments:

- Exhibit 1: 173183 Ellen Elizabeth Branch Full Hearing Notice (EY25)
- Exhibit 2: 136923 Ellen Elizabeth Branch Order (EY23)

PDC Exhibit 1



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September 14, 2023

Ellen Elizabeth Branch
16730 98TH AVE SW
VASHON, WA 98070

And delivered electronically to riverbranch@gmail.com

Subject: PDC Order, Case 139623

Dear Ellen Elizabeth Branch,

Enclosed is a copy of the Public Disclosure Commission's Order Imposing Fine that was entered in the above-referenced case.

At the August 17, 2023, Brief Enforcement hearing, the Presiding Officer assessed a total civil penalty of \$250, of which \$100 is suspended, in accordance with WAC 390-37-143. The \$150 non-suspended penalty is payable within 30 days of the date of this Order, which is **October 16, 2023.**

Please make the check or money order payable to "WA State Treasurer" and mail the payment to the following address:

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

It is also ordered that you file the missing C-1 report within 30 days of this order, which is **October 16, 2023.**

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at pdcc@pdcc.wa.gov

Sincerely,

Electronically Signed by Tabitha Townsend
PDC Staff

Enclosure: Initial Order



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

PDC Case 139623

Ellen Elizabeth Branch,

Respondent.

Findings of Fact,
Conclusions of Law, and
Order Imposing Fine

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to Ellen Elizabeth Branch dated July 13, 2023, a brief adjudicative proceeding was held on August 17, 2023, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.205 by failing to file or timely file a Candidate Registration (C-1 report), which was due to be filed within two weeks of candidacy or no later than June 2, 2023.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Chair Nancy Isserlis was the Presiding Officer. Commission staff was represented by Compliance Coordinators, Jordan Campbell and Tabitha Townsend. The Respondent did not participate in the hearing or submit any written material.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent is or was a candidate for SCHOOL DIRECTOR of VASHON SD 402.
2. As a candidate, the Respondent was required to file a C-1 report by June 2, 2023.
3. The Respondent did not file the C-1 report by the date of the enforcement hearing.
4. The Respondent has no prior violations.

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated RCW 42.17A.205 by failing to file the C-1 report by June 2, 2023.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED** that the Respondent shall file the missing C-1 report within 30 days of the date of this Order and is assessed a total civil penalty of \$250, in accordance with the candidate C-1 penalty schedule set forth in WAC 390-37-143.
2. It is further ordered that \$100 of the \$250 penalty is suspended on the following conditions:
 - a. The Respondent does not commit any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this 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.
 - b. The Respondent pays the \$150 non-suspended civil penalty within 30 days of the date of this Order.
 - c. The Respondent files the missing C-1 report within 30 days of the date of this Order.
3. It is further ordered that, if the Respondent fails to comply with any of the above conditions:
 - a. The full \$ penalty shall immediately become due without further action by the Commission and PDC Staff is directed to refer the matter to collections and/or commence other legal proceedings as authorized by RCW 42.17A and 390 WAC.
 - b. The missing C-1 report shall be due immediately.

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 14th day of September 2023

Public Disclosure Commission

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

I, Tabitha Townsend, certify that I emailed and mailed a copy of this order to the Respondent at their respective addresses of record on the date stated herein.

Electronically Signed Tabitha Townsend
Signed

September 14, 2023
Date

APPEALS OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).
- All requests for review must be submitted electronically to pdcc@pdcc.wa.gov

REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the FINAL ORDER. *See* WAC 390-37-142(7).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.

PDC Exhibit 2



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September 3, 2025

Ellen Elizabeth Branch
16730 98TH AVE SW,
Vashon, WA 98070

Also delivered electronically to riverbranch@gmail.com.

Subject: C-1 Enforcement Hearing Notice; PDC Case Number 173183

Dear Ellen Elizabeth Branch

Public Disclosure Commission (PDC) records indicate that you are or were a candidate for public office in 2025, and we have not received a Candidate Registration (C-1 report) disclosing your campaign information for the 2025 election cycle.

RCW 42.17A.205 requires candidates to file a C-1 report within two weeks of declaring their candidacy, which were to have been filed no later than May 23, 2025.

In accordance with RCW 42.17A.110 and RCW 42.17A.755, an Adjudicative Proceeding (Enforcement Hearing) has been scheduled to determine if you violated RCW 42.17A.205 for failing to file the required C-1 report for the 2025 election cycle. Under the Enforcement Hearing rules, the Commission has the authority to assess a civil penalty in accordance with WAC 390-37-182, the Enforcement Hearing penalty schedule adopted by the Commission (see enclosed copy).

HEARING INFORMATION

Date and time:	September 25, 2025, at 9:50 a.m.
Place:	711 Capitol Way Rm. 206 Olympia, WA 98504 Live Audio and Online Transmission
Presiding Officer:	Public Disclosure Commission
Authority:	RCW 42.17A and WAC 390

PARTICIPATING VIA MICROSOFT TEAMS

The Enforcement Hearing will be audio and video recorded. The Commissioners and PDC staff will join the meeting in-person or remotely via Microsoft Teams videoconferencing platform.

Anyone wishing to participate in the hearing remotely must follow the instructions below and join the meeting on a computer or mobile app **promptly at 9:40 on September 25, 2025**. Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave or stay in the meeting.

Please note that you must stay muted at all times except while your case is being heard.

Join on your computer or mobile app:

<https://tinyurl.com/4yskbd7h>

Dial in by phone [+1 564-999-2000](tel:+15649992000); phone conference ID 757828431#

If you are unable to use Teams or experience technical difficulties, please call the PDC's main number 1-360-753-1111 to obtain information regarding alternate participation by telephone.

INTERPRETER

If a party or witness to this proceeding speaks limited English or is hearing-impaired, and needs an interpreter, a qualified interpreter will be appointed at no cost to you. Please inform us at least five business days before the hearing or no later than **September 18, 2025**, if you require an interpreter for this proceeding and/or translation of its written materials in a language other than English. Please contact us by email at pdcc@pdcc.wa.gov or call us at (360) 753-1111 or 1-877-601-2828 to request an interpreter.

SUBMITTING WRITTEN MATERIALS

In advance of the Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Commission, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by no later than **September 16, 2025, at 1 p.m.**

SUBMITTING THE REPORTS

You are strongly encouraged to complete and submit the required reports online prior to the Brief Enforcement Hearing so they are received by the PDC no later than **September 24, 2025**. The reports must be submitted electronically. Instructions for filing the C-1 can be found [here](#).

If you have any questions about the hearing process prior to the hearing date, please contact PDC Staff by email at pdcc@pdcc.wa.gov – and be sure to reference your case number in the subject line of the email. Information can also be found on the PDC site [here](#).

Sincerely,

PDC Staff
Compliance and Enforcement Division



Enclosures

- PDC Penalty Schedule

Penalty Schedule [[WAC 390-37-182](#)]:

Penalty factors (full adjudicatory proceedings).

(1) In assessing a penalty after a full adjudicatory proceeding, the commission considers the purposes of chapter [42.17A](#) RCW, including the public's right to know of the financing of political campaigns, lobbying and the financial affairs of elected officials and candidates as declared in the policy of RCW [42.17A.001](#); and, promoting compliance with the law. The commission also considers and applies RCW [42.17A.755](#) and may consider any of the additional factors described in subsection (3) of this section.

(2) Under RCW [42.17A.755](#), the commission:

- (a) May waive a penalty for a first-time violation;
- (b) Must assess a penalty for a second violation by the same person or individual, regardless if the person or individual committed the violation for a different political committee;
- (c) Must assess successively increased penalties for succeeding violations pursuant to the following schedule:

Violations:			
Respondent failed to file or timely file an accurate or complete: (1) Statement of Financial Affairs (F-1 Report) / (2) Candidate Registration / (C-1 Report) / (3) Lobbyist Monthly Expense Report (L-2 Report) / (4) Lobbyist Employer Annual Report (L-3 Report) and (5) Local Treasurer's Annual Report (T-1 Report).			
	1st Occasion	2nd Occasion	3rd Occasion
Filed missing report after being notified about the complaint and provided written explanation with mitigating circumstances.	\$0 - \$500	\$500 - \$1,500	\$1,500 - \$2,500
Report is filed late and is incomplete or inaccurate.	\$0 - \$1,000	\$1,000 - \$2,000	\$2,000 - \$3,000

[Excerpt above]

(3) In addition to the requirements of RCW [42.17A.755](#), the commission may consider the nature of the violation and any relevant circumstances, including the following factors:

- (a) The respondent's compliance history, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;
- (b) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period, or otherwise had a significant or material impact on the public;
- (c) Sophistication of respondent or the financing, staffing, or size of the respondent's campaign or organization;
- (d) Amount of financial activity by the respondent during the statement period or election cycle;
- (e) Whether the noncompliance resulted from a knowing or intentional effort to conceal, deceive or mislead, or violate the law or rule, or from collusive behavior;
- (f) Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;
- (g) Whether the respondent or any person, including an entity or organization, benefited politically or economically from the noncompliance;
- (h) Personal emergency or illness of the respondent or member of his or her immediate family;
- (i) Other emergencies such as fire, flood, or utility failure preventing filing;
- (j) PDC staff or equipment error, including technical problems at the PDC preventing or delaying electronic filing;

(k) The respondent's demonstrated good-faith uncertainty concerning staff guidance or instructions;

(l) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention (e.g., filing missing reports, amending incomplete or inaccurate reports, returning prohibited or overlimit contributions);

(m) Whether the respondent is a first-time filer;

(n) Good faith efforts to comply, including consultation with PDC staff prior to initiation of enforcement action and cooperation with PDC staff during enforcement action, and a demonstrated wish to acknowledge and take responsibility for the violation;

(o) Penalties imposed in factually similar cases; and

(p) Other factors relevant to a particular case.

(4) The commission may consider the factors in subsections (1) through (3) of this section in determining whether to suspend a portion or all of a penalty upon identified conditions, and whether to accept, reject, or modify a stipulated penalty amount recommended by the parties.

(5) Notwithstanding the above schedule, the commission may assess a penalty of up to ten thousand dollars per violation, or a greater amount if agreed to by the parties, pursuant to RCW [42.17A.755](#), based on the aggravating factors set forth in subsections (1) through (3) of this section.

(6) The penalty schedule for brief enforcement proceedings is provided under WAC [390-37-143](#).

[Statutory Authority: RCW [42.17A.110](#)(1), 2019 c 428, and 2019 c 261. WSR 20-02-062, § 390-37-182, filed 12/24/19, effective 1/24/20. Statutory Authority: RCW [42.17A.110](#)(1) and 2018 c 304. WSR 18-24-074, § 390-37-182, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW [42.17A.110](#)(1). WSR 16-01-015, § 390-37-182, filed 12/4/15, effective 1/4/16. Statutory Authority: RCW [42.17A.110](#), [42.17A.755](#). WSR 13-05-014, § 390-37-182, filed 2/7/13, effective 3/10/13.]