



**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@pdc.wa.gov • Website: www.pdc.wa.gov

June 24, 2022

Delivered electronically to Stanwood-Camano School District at “cpl@pattersonbuchanan.com”
& “drumbaugh@stanwoodcamano.wednet.edu”

Subject: Complaint filed by Steven J. Adams, PDC Case 106965

Dear Mr. Leitch:

Below is a copy of an electronic letter sent to Steven J. Adams concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Adams, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of limiting the content of any information produced by the District regarding ballot propositions to factual information only in accordance with the statutes, rules and *PDC Interpretation No. 01-03*. PDC staff expects in the future that you will produce a set of factual information about the necessity for a bond or levy and the financial impact of the ballot specific proposition in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavallee
Executive Director



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June 24, 2022

Delivered electronically to Steven J. Adams at “steven.adams7140@yahoo.com”

Subject: Complaint regarding Stanwood Camano School District, PDC Case 106965

Dear Steven Adams:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 9, 2022. The complaint alleged that Stanwood-Camano School District (the District), a public school district located in Stanwood, Washington, may have violated RCW 42.17A.555 for using of public facilities to promote a ballot proposition in the April 26, 2022 special election.

PDC staff reviewed the allegations; the applicable statutes, rules; *PDC Interpretation No. 01-03*; and the response provided by Attorney Charles P.E. Leitch with Patterson Buchanan Fobes & Leitch Inc. P.S. on behalf of the Respondent, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- Stanwood-Camano School District Replacement Capital Projects and Technology Levy was placed on the April 26, 2022 special election ballot. The levy originally appeared on the February 8, 2022 special election ballot but failed to pass.
- The District created a set of facts describing the purpose of the replacement levy and how the funds would be spent if the ballot proposition passed. This information was disseminated via mail, an online video and posted to the District’s website and social media.
- The complaint alleged that the Respondent used public funds for the April ballot proposition when creating flyers, mailers and posting information on the District’s website and social media, that were meant to influence the outcome of the election.
- *PDC Interpretation No. 01-03 Guidelines for School Districts* describes permissible activities of a publicly funded entity including the dissemination of “objective and fair presentation of the facts” which means that in addition to presenting facts, any materials should present accurately the costs and other anticipated impacts of a ballot measure. The Interpretation also allows a school district to distribute these materials in accordance with the normal and regular conduct of the school district.
- In his response, Mr. Leitch stated that the District created a set of facts for use in the February levy and updated those facts when the proposition was later placed on the April ballot. He further stated that this factual information was distributed and posted according to the District’s “normal and regular” method.
- The response included a copy of both mailers paid for and created by the District for both special elections, plus copies of the Winter 2021 and Spring 2022 District newsletters which the Respondent attests are regular publications.

- Staff’s review of the April levy written materials found them to be consistent with the guidelines found in *PDC Interpretation No. 01-03* regarding the creation of such materials. Staff found the majority of the online communication regarding the levy to be consistent with the interpretation as well.
- Staff did find that the online video created by the District apparently to communicate with the public about the April levy included more than factual materials. For example, there were interviews with teachers and other staff sharing their backgrounds and why they enjoy working with the District.

It appears that the District created factual information regarding the April ballot proposition and disseminated it in a manner consistent with the “normal and regular” conduct of the District. The District has shown a recent history of including factual information regarding ballot propositions in their newsletter along with other general District news and updates.

Based on our findings staff has determined that, in this instance, the use of public funds to create and disseminate information about the District’s Replacement Capital Projects and Technology Levy appearing on the April 26, 2022 special election ballot, no evidence supports a finding of a violation that warrants further investigation.

However, PDC staff is reminding Stanwood-Camano School District about the importance of limiting the content of any information produced by the District regarding ballot propositions to factual information only in accordance with the statutes, rules and *PDC Interpretation No. 01-03*.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavalley
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cc: Stanwood-Camano School District