



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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***NOTE: On Jan. 1, 2026, Chapter 42.17A was recodified to Title 29B RCW***

May 8, 2026

Delivered electronically to: [gmansell@washingtonea.org](mailto:gmansell@washingtonea.org)

Subject: PDC Case 139384 re: Washington Education Association Political Action Committee(1)

Aimee Iverson c/o Abby Lawlor:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Glen Morgan on June 15, 2023 and Conner Edwards on July 30, 2025.

The complaint filed by Glen Morgan alleged that Washington Education Association Political Action Committee (Washington Education Association PAC, WEA-PAC, PAC, or Committee) may have violated RCW 42.17A.235 and .240 from 2018 to 2023 by failing to disclose complete descriptions of in-kind contributions received from its parent organization, Washington Education Association (WEA).

Staff informed WEA-PAC that in reviewing the reports linked in the spreadsheet provided by the complainant, it appears there are instances where addresses of vendors were not disclosed in the description field for in-kind contributions, and that in some instances, the in-kind descriptions do not include the name of vendors paid by the in-kind contributor, who is typically the WEA. Staff noted that PDC guidance encourages more complete disclosure of vendor addresses in the description field for in-kind contributions, even if not strictly required.

The complaint filed by Conner Edwards alleged that WEA-PAC: (1) filed a C-3 report 12 days after the funds were deposited on July 15, 2025; and (2) filed its 2025 7-day pre-primary election C-4 report one day after its due date.

Applicable Laws and Rules

**RCW 42.17A.235 and .240** - A committee that selects the Full Reporting option on its C-1pc report is required to report contributions and expenditures to the PDC on C-3 and C-4 reports pursuant to RCW 42.17A.235 and RCW 42.17A.240. The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity. These reports must include the name and address of each person who has made one or more contributions during the period, together with the

money or in-kind value, the date of each contribution, and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with certain exceptions. In-kind contributions must include a description of the contribution, including, in most cases, the name and address of vendors where contributed goods or services were purchased, and if applicable, the same information for subvendors used by vendors.

**WAC 390-16-037** requires political committees to disclose the purpose of expenditures reported under RCW 42.17A.240, including the name of any candidate supported or opposed by the expenditure, and the details of goods and services to be provided by the recipient of the expenditure.

### Background and Findings

- The Washington Education Association is the largest representative of public school employees in the state of Washington. WEA formed Washington Education Association Political Action Committee to recommend and elect pro-public-education candidates to office and funds a majority of the PAC's activities through in-kind contributions. WEA-PAC has been reporting to the PDC since it first registered on September 27, 2001.

### Violations Alleged by Morgan

- Morgan's complaint alleged that WEA-PAC has failed to disclose complete descriptions of in-kind contributions received from its parent organization, WEA. Morgan drew attention to the PDC's website recommendations for how PAC's and campaigns need to report the receipt of in-kind contributions. Morgan noted that the PDC's website guidance states:

***“In-kind donations that are not incidental must be fully reported in Part 1 of Schedule B to the C-4 with the following details:***

- ***the date the contribution was received;***
- ***the name and full address of the contributor;***
- ***if the in-kind contribution is a good or service purchased from a vendor, include the name and address of the vendor;***
- ***a brief description of the contribution;***
- ***its fair market value;***
- ***the cumulative total this contributor has given for the primary or general election, whichever applies;***
- ***a designation whether this contribution is for the primary or general election; and***
- ***if the contributor is an individual who has cumulatively given more than \$250 to the campaign, including both primary and general contributions, identify the individual's employer (by name, city and state) and occupation.”***

- Morgan submitted a spreadsheet with approximately 460 instances of reports filed with the PDC between June 30, 2018 and May 31, 2023, which he said demonstrates WEA-PAC's alleged failure to provide adequate descriptions of in-kind contributions, in accordance with the guidance found on the PDC website.

### WEA-PAC's Response to Glen Morgan's Complaint

- Abby Lawlor, an attorney with Barnard Iglitzin & Lavitt (Lawlor, The Iglitzin Law Firm, or The Law Firm), responded to the alleged violations on behalf of WEA-PAC. Lawlor stated that there is no basis in the Fair Campaign Practices Act (FCPA) for the level of disclosure sought by Morgan and asked the PDC to dismiss the complaint as unfounded or frivolous.
- Lawlor noted that WEA-PAC is governed by a 30+ member board of directors and is funded by small-dollar donations from WEA members and staff and from WEA, which makes significant in-kind contributions, mostly in the form of staff time, office space, supplies, and other overhead. Lawlor noted that WEA-PAC has repeatedly disclosed WEA as the source of virtually all of its in-kind contributions. She noted that WEA-PAC has broken-out the in-kind contributions both by reporting period and by the nature of the contributions.
- Lawlor emphasized that Morgan did not cite the FCPA or its rules to support his allegations, instead citing guidance language on the PDC’s website. Lawlor also noted that when the PDC informed WEA-PAC of Morgan’s complaint, staff stated,

“In reviewing the reports linked in the spreadsheets provided by the Complainant, it appears there are some instances where addresses of vendors are not disclosed in the description field for in-kind contributions, and in some cases, the name of the vendors paid are not disclosed. In our guidance, staff encourages more complete disclosure of vendor addresses in the description field for in-kind contributions even if not strictly required.”

- Lawlor stated that while the Commission’s rules and declaratory orders can be grounds for finding a violation, language on the PDC’s website serving as guidance to candidates and committees cannot serve as standalone grounds for finding a violation when such guidance is not followed.
- Lawlor stated that the FCPA and its rules suggest that in-kind contributions are subject to the same reporting requirements as monetary contributions, which includes disclosing the contributor’s name and address, and when appropriate, the contributor’s occupation and the city and state of the contributor’s employer. Lawlor stated that WEA-PAC has consistently reported the name and address of vendors used by WEA to provide goods and services to WEA-PAC, unless the goods and services were purchased primarily for WEA’s use in its ordinary course of business, such as use of WEA office space and other expenses associated with the use of shared staff.

### **Direction Provided by PDC Staff**

- In mid-August 2023, PDC staff began sharing with WEA-PAC its expectations for vendor disclosure when WEA-PAC reports the receipt of in-kind contributions from WEA. Staff informed WEA-PAC that, generally, when there is a WEA-PAC meeting and office supplies of WEA are used for the meeting, those supplies would be in-kind contributions from WEA, but there would be no need to identify where the supplies were purchased since they were purchased for internal use by WEA. Staff clarified that if WEA makes a purchase for goods or services specifically for WEA-PAC, the vendor’s name and address should be reported as part of the PAC’s description of the in-kind contribution. Lawlor requested a meeting with PDC staff to find out what amendments staff is asking WEA-PAC to file.

- In December 2024, staff asked WEA-PAC to amend its descriptions of in-kind contributions received from WEA beginning with the period January 1, 2024, in accordance with staff recommendations. In March 2025, Lawlor and PDC staff met to discuss staff's expectations for the amended reports.
- In June 2025, Lawlor informed PDC staff that Quorum, the PAC's reporting-software vendor that initially had a restrictive character limitation, was ultimately able to address the character limitation issue that was keeping WEA-PAC from adding the more detailed information to amended and new reports being requested by PDC staff.
- On August 17, 2025, staff updated Lawlor on its expectations for amended and new reports, based, in part, on WEA-PAC's software being able to overcome prior character limitations. In support of its request for more detailed descriptions of in-kind contributions, staff informed Lawlor that the instructions for in-kind contribution descriptions provided in December 2024 were, for the most part, unchanged, and that because in-kind contributions represent both contributions and expenditures it is reasonable to apply the description standards for monetary expenditures to in-kind contributions. Therefore, when WEA pays a vendor and the payment results in an in-kind contribution to WEA-PAC, staff expects WEA-PAC to include a description of the in-kind contribution that matches or is similar to what would be required for a monetary expenditure (e.g. the vendor's name and address and who benefitted if the in-kind contribution was a for a candidate or ballot proposition and the purpose of the expenditure).

### **Meeting Expenses**

- For meeting expenses paid by WEA on behalf of WEA-PAC, staff asked WEA-PAC to report the name and address of hotels and similar vendors they paid for lodging and food in support of the meetings.

### **Overhead Expenses**

- For overhead expenses attributed to Gena Mansell and Karen Burrows for accounting and compliance work, staff asked WEA-PAC to provide a more detailed explanation of the amounts reported each month.

### **Other Overhead Expenses**

- For other overhead expenses paid by WEA on behalf of WEA-PAC, staff asked for descriptive details (e.g. if for utilities, a description of the service being paid for and the name and address of the vendor).

### **Printing Services**

- For printing services or supplies paid by WEA on behalf of WEA-PAC, staff asked for the name and address of the vendor paid and descriptive details that match or are similar to what would be required if the expenditure had been reported as a monetary expenditure.

### **Online Services**

- For online services paid by WEA on behalf of WEA-PAC, staff asked for descriptive details, including the name and address of vendors paid.

## **Zoom Communications and Campaign Reporting Software**

- For Zoom communications and payments for reporting software (Quorum) staff asked WEA-PAC to report the vendor's name and address and a description of the service provided.

## **Audit and Legal Services**

- For audit and legal services paid by WEA on behalf of WEA-PAC, staff asked WEA-PAC to report the vendor's name and address and a description of the services provided.

## **Other Matters**

- On August 18, 2025, Lawlor expressed concern that some of the amendments being requested went beyond previous discussions and beyond the scope of what the statute and rules require.
- On August 20, 2025, staff spoke with Lawlor again to clarify staff's expectations for descriptions of in-kind contributions included on C-4 reports covering reporting periods from September 1, 2024 through August 31, 2025. Staff asked Lawlor to explain the nature of the meetings that involve WEA members attending and being reimbursed for out-of-pocket expenses. Staff asked Lawlor to explain whether WEA in-kind contributions for reimbursements are for all expenses if staff members split their time between PAC and union business.
- On August 26, 2025, Lawlor provided additional explanations in response to staff's questions, stating that the most frequent meetings for which WEA-PAC reports in-kind contributions from WEA are WEA-PAC Board Meetings that focus exclusively on PAC business. Lawlor stated WEA-PAC also reports in-kind contributions related to the WEA Representative Assembly that focuses, in part, on PAC business. Lawlor also stated WEA-PAC also reports as in-kind contributions reimbursements for WEA members attending quarterly or annual WEA meetings when the meetings are for PAC business.
- Lawlor said the large in-kind contributions from WEA for payments to Gena Mansell and Karen Burrows are for salary and benefits, payroll processing fees, and the cost of WEA-PAC office space, for 100 percent of Mansell's time and 75 percent of Burrows' time for providing accounting, compliance, and related services to WEA-PAC.

## **Final Instructions for WEA-PAC Amended C-4 Reports**

- Staff asked WEA-PAC to amend its descriptions of in-kind contributions for calendar years 2024 and 2025, and going forward, as recommended by staff and discussed with Abby Lawlor, representing WEA-PAC in this matter. Staff asked WEA-PAC to include more detailed descriptions of in-kind contributions, and when WEA makes payments to outside vendors for goods or services for WEA-PAC, to include the name and address of the vendor and a description of the goods or services purchased. Also, staff asked WEA-PAC to identify the candidate or ballot proposition benefitted when an in-kind contribution is attributable to a specific candidate or ballot proposition.
- For in-kind contributions previously described as "**Employee Services**" staff asked WEA-PAC to describe the services being performed by the WEA employees. Staff did not ask for the names of the individual employees, but for a more detailed description of the activities and, if applicable, the specific candidate or ballot proposition supported.

- For in-kind contributions previously described as “**Meeting Expenses**” that include reimbursements to WEA members attending board meetings where PAC business is discussed, and for quarterly or annual meetings, staff did not ask for the names of the individuals attending or for the names and addresses of the hotels and restaurants, etc. used by the employees being reimbursed, but asked for a more detailed description of the purpose of the meetings and the expenses being included in the in-kind contributions.
- For in-kind contributions described as “**Overhead**” if the overhead is a portion of WEA’s overhead that has been allocated for the support of WEA-PAC’s activities, staff asked for a description of the amount reported but not for the name and address of the underlying vendor supplying the utility service for WEA’s operation.
- For the reports that include several large, monthly in-kind contributions described as “**Overhead – Gena H. Mansell**” and “**Overhead – Karen Burrows,**” with little information about the nature of the overhead, staff asked for a more detailed description of what these large monthly contributions represent.
- For in-kind contributions described as “**Printing Expenses**” or “**Supplies,**” if WEA paid for WEA-PAC printing or purchased supplies for WEA-PAC, staff asked for the name and address of the vendor and a description of what was purchased. If WEA provided supplies to WEA-PAC from what it had purchased for its own use, staff did not ask for the name and address of the underlying vendor but asked for a description of the items provided to WEA-PAC.
- For entries such as, “**Candidate Endorsement Interviews,**” staff asked for a more detailed description of what the contribution represents.
- For in-kind contributions described as **Online Services**, staff asked for a more detailed description of the services, including the name and address of vendors paid. For payments made to Zoom Communications or for reporting software (Quorum), staff asked that the vendor’s name and address be reported. Staff asked that online services for the purchase of political advertising include a description of the advertising in accordance with the expenditure disclosure requirements found in WAC 390-16-037 and WAC 390-16-205.
- For **Audit and Legal Services**, staff asked for a brief description of the nature of the services and the vendor’s name and address.
- For in-kind contributions described as “**Consulting Services,**” staff asked for the name and address of the vendor and a brief description of the services being provided. Staff asked that subvendor information be provided in accordance with WAC 390-16-037, and if an agent is paid to perform reportable activities, that those contributions be reported in accordance with WAC 390-16-205.
- Lawlor requested, and received, a brief extension for filing amended C-4 reports, and on November 5, 2025, WEA-PAC filed amended reports, as requested by PDC staff, for 2024 and 2025, and going forward. The amended reports reflect staff’s final instructions for providing more detailed and descriptive information for the in-kind contributions.

- The complaint filed by Conner Edwards alleged that WEA-PAC: (1) filed a C-3 report six days late (12 days after the funds were deposited) on July 15, 2025; and (2) filed its 2025 7-day pre-primary election C-4 report one day late. The complaint also alleged that the C-4 expenditures did not include the number of umbrellas purchased or the address of subvendors.
- Lawlor replied on behalf of WEA-PAC, stating, in part, “The Committee’s delay in filing these two reports was the result of a week-long office closure in July that created a backlog in the Committee’s reporting and compliance work. The C-3 report filed on July 27 for a deposit made on July 15, 2025, disclosed a total of \$2,200 in contributions, made up entirely of \$20 contributions from persons who are recurring PAC donors. Given the small dollar amount of these contributions, and the fact that the identities of these contributors have been disclosed through other C-3 reports filed by the Committee, this six-day delay did not have a material impact on the public. The 7-day pre-primary report, filed just one day after the reporting deadline, was in substantial compliance with the requirements of RCW 42.17A.235(2)(b).”
- Lawlor further stated, “Mr. Edwards also alleges that WEA-PAC violated the Fair Campaign Practices Act (FCPA) by failing to disclose the quantity of umbrellas purchased by WEA and in-kind to WEA-PAC on April 30, 2025. Mr. Edwards does not cite the specific provision(s) of the FCPA or accompanying regulations that he believes were violated. And there is no clear basis in the law for requiring disclosure of the number of umbrellas purchased. While WAC 390-16-037 and WAC 390-16-205 offer illustrative examples of expenditure descriptions that include quantities, these examples are not clearly analogous to WEA’s umbrella purchase for two reasons. First, WAC 390-16-037 refers to expenditures ‘made directly to a vendor.’ Similarly, WAC 390-16-205 offers examples of expenditures ‘made directly to a vendor’ or payments from candidates or political committees to ‘a consultant or other agent.’ By their own terms, these examples do not apply to in-kind contributions. Second, the only examples that disclose the quantity purchased involve political advertising. See WAC 390-16-037 (Example B – brochures); WAC 390-16-207 (Example A – mail pieces). Here, the umbrellas purchased were promotional items for WEA-PAC and did not constitute political advertising.”
- Lawlor continued, “Given the lack of clarity in the law as to when quantity is required, and the diminished public interest in such disclosure outside of the context of political advertising, the Committee’s failure to report the number of umbrellas in-kind by WEA is not a material violation of the Act. As part of its ongoing efforts to resolve Case No. 139384, WEA-PAC will provide additional disclosure related to the vendor for this purchase and can additionally provide the quantity of umbrellas (and blankets) purchased if so instructed by the PDC.”

#### Conner Edwards Complaint Filed March 28, 2026 (Returned/Dismissed)

- Conner Edwards filed a complaint on March 28, 2026 alleging that WEA-PAC had reported \$2,200 in contributions, received July 18, 2025, 246 days late on March 24, 2026. However, the C-3 Report described in the March 28, 2026 complaint was an amendment of the C-3 report cited by Edwards in his July 30, 2025 complaint, meaning that the original C-3 report with \$2,200 in contributions was reported July 27, 2025 and was amended March 24, 2026 to correct the date received for all of the contributions from July 15, 2025 to July 18, 2025.

#### Summary and Resolution

Morgan's complaint highlighted multiple instances from 2018 to 2023 where WEA-PAC did not include adequate descriptions of in-kind contributions received from Washington Education Association. In addition to monetary contributions from WEA members, WEA-PAC receives significant in-kind contributions from WEA that sustains its operation. No evidence was found that WEA-PAC reported in bad faith or intentionally provided inadequate descriptions of the in-kind contributions it received from WEA. WEA-PAC worked cooperatively with PDC staff to understand the level of detail being requested by staff. WEA-PAC then filed amended reports as instructed by staff for 2024 and 2025 and agreed to continue filing with the same level of detail, even if not explicitly required by statute or rule.

WEA-PAC has completed a Statement of Understanding (SOU), without a civil penalty, in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and .240 and WAC 390-16-037 for not adequately reporting descriptions of in-kind contributions received beginning April 1, 2021. The SOU resolves the allegations made by Morgan in this case, and based on this information, the PDC has dismissed this matter in accordance with RCW 29B.60.020. Staff expects WEA-PAC to provide compliant in-kind contribution descriptions in the future.

Edwards' complaint concerned one C-3 report disclosing \$2,200, filed six days late and one C-4 report filed one day late. The alleged failure to disclose the number of items purchased for a purchase of umbrellas did not involve political advertising and therefore, does not appear to be reportable. In this instance, filing one C-3 report six days late and one C-4 report one day late does not amount to a finding of a violation that warrants further investigation.

Based on this information, the PDC has dismissed this matter in accordance with RCW 29B.60.020.

If you have questions, you may contact Phil Stutzman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Electronically signed by Phil Stutzman

Phil Stutzman  
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavalley

Peter Frey Lavalley  
Executive Director

cc: Glen Morgan  
Conner Edwards