



## State of Washington

### PUBLIC DISCLOSURE COMMISSION

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### **Public Disclosure Commission Statement of Understanding Washington Education Association Political Action Committee (1) PDC Case 139384**

I, Aimee Iverson, in my capacity as Secretary/Treasurer of Washington Education Association Political Action Committee (WEA-PAC), hereby acknowledge that beginning April 1, 2021 WEA-PAC violated RCW 42.17A.235 and RCW 42.17A.240 and WAC 390-16-037 by failing to provide adequate descriptions for in-kind contributions received from Washington Education Association (WEA) on its C-4 Reports of contributions and expenditures.

The facts are as follows:

- A complaint filed by Glen Morgan on June 15, 2023 included a spreadsheet with approximately 460 instances of reports filed with the Public Disclosure Commission (PDC ) between June 30, 2018 and May 31, 2023, which he alleged demonstrated WEA-PAC's failure to disclose complete descriptions of in-kind contributions received from its parent organization, Washington Education Association, in accordance with guidance found on the PDC website. Morgan drew attention to the PDC's website recommendations for how PACs and campaigns need to report the receipt of in-kind contributions.
- WEA-PAC 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. WEA-PAC has repeatedly disclosed WEA as the source of virtually all of its in-kind contributions and has described the in-kind contributions by reporting period and by the nature of the contributions.
- On several occasions, WEA-PAC did not disclose addresses of vendors in the description field for in-kind contributions, and in some cases, did not include the

- name of the vendors paid by WEA. Initially, staff acknowledged the practice of encouraging more complete disclosure of vendor addresses in the description field for in-kind contributions even if not strictly required.
- Staff updated WEA-PAC concerning 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 WEA-PAC 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, staff expects the description standards for monetary expenditures to be followed for the description of in-kind contributions.
  - Staff asked WEA-PAC to amend its in-kind contribution descriptions for calendar years 2024 and 2025, and going forward, by providing more detailed descriptions, and when WEA makes payments to outside vendors for goods or services that benefit WEA-PAC, to include the name and address of the vendor and a description of the goods or services purchased. Expectations were provided for reporting in-kind contributions for employee services, meeting expenses, overhead, printing expenses, supplies, candidate endorsement interviews, audit and legal services, and consulting services. WEA-PAC amended its reports in accordance with staff's requests.
  - Aggravating Factors: The Respondent is a large, well-funded committee that has been in existence for many years and has extensive experience filing reports with the PDC.
  - Mitigating Factors: WEA-PAC provided descriptions for the in-kind contributions received from Washington Education Association in the manner it believed was consistent with existing statutes and rules. WEA-PAC worked cooperatively with PDC staff and amended its C-4 reports for 2024 and 2025, and going forward, in accordance with requests made by staff.

Washington Education Association Political Action Committee would like to avoid the time and expense of a hearing before the Commission. Therefore, in lieu of a hearing before the Commission, WEA-PAC acknowledges that it violated RCW 42.17A.235 and .240 and WAC 390-16-037 and agrees to enter into this *Statement of Understanding* (SOU) to resolve all issues

with the PDC regarding their failure to adequately report descriptions of in-kind contributions received beginning April 1, 2021.

Washington Education Association Political Action Committee further understands that, by signing this SOU, they acknowledge the violations of Title 42 RCW<sup>1</sup> and Title 390 WAC set forth above and waive their right to a hearing in this matter.



5/8/2026

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Aimee Iverson, Secretary/Treasurer, WEA-PAC

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Date Signed

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<sup>1</sup> Since recodified at Title 29B RCW.