



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

Memorandum

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: March 30, 2026

Subject: Citizens for Ridgefield Schools Enforcement Hearing Memorandum: PDC Case #151075

NOTE: Effective Jan. 1, 2026, Chapter 42.17A RCW was recodified to Title 29B RCW. Because the events at issue in this investigation occurred in 2025 or earlier, this investigation uses the citations to Chapter 42.17A.

Allegations:

Public Disclosure Commission (PDC) staff alleges that Citizens for Ridgefield Schools violated RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately file expenditure (C-4) reports.

Case Background:

- The PDC received complaints filed by: (1) Glen Morgan on March 2, 2024, and October 10, 2024; (2) Heidi Pozzo on April 28, 2024; and (3) Conner Edwards on April 2, 2024, April 17, 2024, and November 5, 2025. The complaints alleged violations of RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately disclose contributions and expenditures.
- Citizens for Ridgefield Schools (the Respondent) was registered with the PDC to support ballot propositions in the February 8, 2022, April 25, 2022, August 2, 2022, April 23, 2024, and February 11, 2025, special or primary elections.

Allegation 1 – Inaccurate Carry Forward Balance

- The Respondent has a carry forward balance discrepancy from the final C-4 report ([110139867](#)) for the August 2, 2022, primary election to the beginning balance for the April 23, 2024, special election C-4 report ([110202854](#)).

- The Respondent has a carry forward discrepancy from the last C-4 report ([110217164](#)) for April 23, 2024, special election to the first C-4 report ([110268961](#)) for the February 11, 2025, special election.

Allegation 2 – Inaccurate or Missing Reports

- The Respondent submitted the 21-day pre-election C-4 report ([110205937](#)) for the April 23, 2024, special election, early on March 19, 2024, but failed to include a deposit made on March 25, 2024. The C-4 report ([110210502](#)) was amended fourteen days late on April 16, 2024, to capture the missed deposit.
- The Respondent submitted the 7-day pre-election C-4 report ([110210207](#)) for the April 23, 2024, special election, early on April 12, 2024, but failed to include a deposit disclosed later that same day.
- The Respondent submitted a C-4 report ([110210218](#)) covering September 2022 to December 2023 on April 12, 2024. Based on the date and amount of the earliest expenditure of September 7, 2022, and two expenditures occurring in March 2023, the C-4 report was filed between 368 and 550 days late.

Allegation 3 – Insufficient Expenditure Description

- The Respondent failed to include expenditure details for political advertising expenses disclosed on the C-4 report ([110071505](#)) covering January 18 – 31, 2022.
- The Respondent failed to include expenditure details for political advertising expenses disclosed on the C-4 report ([110202851](#)) covering February 1 – 29, 2024. The Respondent amended the February 1 – 29, 2024, C-4 report ([110205938](#)) on March 19, 2024, to add mailing address for USPS and amended again on April 16, 2024, to add expenditure descriptions for advertising expenses.
- The Respondent filed the 21-day pre-election C-4 report ([110205937](#)) for the April 23, 2024, special election but failed to include subvendor information for in-kind contributions and expenditure details for Sticker Mule expense.
- The Respondent failed to include expenditure details for political advertising expenses disclosed on the C-4 report ([110210219](#)) covering January 1 – 31, 2024.
- The Respondent failed to include sufficient vendor and expenditure detail on the 21-day pre-election C-4 report ([110268961](#)) and the C-4 report ([110279609](#)) covering March 2025, both for the February 11, 2025, special election.

Additional Information:

On January 21, 2026, PDC staff mailed and emailed the Respondent a Hearing notice regarding alleged violations of RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately file expenditure (C-4) reports. This hearing notice was sent to the respondent's email and mailing address of record.

As of March 30, 2026, the Respondent has not: **(1)** corrected the carry forward balance from the August 2, 2022, primary election to the April 23, 2024, special election; **(2)** amended the C-4 covering 1/18/2022 – 1/31/2022 to add expenditure detail; **(3)** amended the 21-day pre-election C-4 report for April 23, 2024, special election to add subvendor information for in-kind contributions or expenditure details; **(4)** amended the 7-day pre-election C-4 report for April 23, 2024, special election to incorporate deposit from April 11, 2024; **(5)** amended the January 2024 C-4 report to add expenditure details for IGN expense; **(6)** amended the March 2024 C-4 report to add expenditure details for TextRequest.com robocalls expense and no mailing address for TextRequest.com; **(7)** submitted any amended or new C-4 reports to address the carry forward balance discrepancy from the April 23, 2024, special election to the February 11, 2025, special election; or **(8)** amended the 21-day pre-election C-4 report for the February 11, 2025, special election to add the mailing address for Amazon.

Prior Violations:

The Respondent signed a Statement of Understanding for PDC Case #122205 for violations of: (1) RCW 42.17A.205 for failure to timely file the C-1pc for the April 25, 2022 special election, and the August 2, 2022, primary election; and (2) RCW 42.17A.235 and RCW 42.17A.240 for failure to timely file C-3 and C-4 reports in 2022.

Aggravating and Mitigating Factors:

- The Respondent currently has outstanding reporting issues.
- The Respondent has submitted some amended or missing campaign reports.

Attachments:

- Exhibit 1 – Case #122205 Resolution Letter



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May 31, 2023

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Citizens for Ridgefield Schools PAC, PDC Case 112205

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 5, 2023. The complaint alleged that Citizens of Ridgefield Schools, a Single Election Committee in the 2022 election cycle, may have violated RCW 42.17A.220 for accepting overlimit anonymous contributions and RCW 42.17A.205, .235, and .240 for failure to timely register as a political committee and report contribution and expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements for a political party committee; the applicable C3 and C-4 reports; the reporting requirement(s) pertinent to the committee registration and anonymous/unidentified contributions statutes; and the response to the complaint received from Alicia Lasch, Treasurer, on behalf of Citizens for Ridgefield Schools PAC (Committee).

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

- On December 7, 2021, the Committee timely filed a Committee Registration (C-1pc report) as a Political Action Committee for the February 2022 special election, selecting the "Full Reporting" Option, and listing Mike Bomer as the Committee treasurer. Staff noted that the Committee participated in three elections in the 2022 election year (February special, April special, and August primary) and was required to file three separate committee registrations for each election cycle. The Committee failed to file the April special election C-1pc and filed the August primary C-1pc on October 17, 2022, 151 days after it was due.
- Beginning June 1, 2022, the Committee was required to file Cash Receipts Monetary Contribution (C-3) reports every Monday, for deposits made during the previous seven days (Monday – Sunday). In addition to the C-3 reports, the Committee was also required to file Summary, Full Report Receipts and Expenditures (C-4) report for the month of May 2022, including all the C-4 reports required during the accelerated reporting period beginning June 1 – August 31, 2022. Staff noted that the Committee did not file the required C-3 and C-4 reports until February 6, 2023, and March 24, 2023, 188 and 234 days, respectively, after the deadline.

- Regarding the alleged violation of RCW 42.17A.220, you attached a C-3 report filed by the Committee on February 6, 2023, depicting an overlimit anonymous contribution to the Committee in the amount of \$5,407. Staff review found that the new treasurer, Alisha Lasch, who took over duties of the Committee treasurer from Michael Bomer, inadvertently filed the Feb 6, 2023, C-3 report showing an overlimit anonymous contribution. The prior treasurer, Michael Bomer had already filed a C-3 report on February 3, 2022, identifying the source of the contribution and contributor as LSW Architects (C-3 report # 110071965).
- On March 14, 2023, the Committee, by way of the new Committee treasurer, Alisha Lasch, submitted a response to the complaint stating: "I took over as treasurer of this group in April 2022. When I took over the task of PDC filing requirements was never mentioned to me as part of my duties. I have no experience with PDC filings as the other organizations I have been involved in as treasurer did not have this requirement. It wasn't brought to my attention until October 2022 that I needed to be doing these filings. We had two campaigns during this time. April 2022 Bond and August 2022 levy. I submitted these filings on the information I had available and to the best of my knowledge."
- On May 26, 2023, the PDC staff received an executed Statement of Understanding (SOU) signed and dated by the Committee's treasurer, Alicia Lasch, along with a \$150 check for the penalty payment. The signed SOU acknowledged two violations of RCW 42.17A.205 for failure to timely register as a political committee and RCW 42.17A.235 for failure to timely and accurately report contributions and expenditures undertaken by the Committee during the 2022 April special and August primary election cycles.

Based on the above review, the PDC staff has determined that, in this instance, the failure to timely file the 21 and 7-Day Pre-Primary C-4 reports for the 2022 election cycles, including the failure to timely file Campaign Registrations (C-1pcs) that were required for the April special and August primary elections, do not warrant further investigation.

The Committee acknowledged the violations and took responsibility by filing the missing reports and the Committee Registration (C-1pc). The Committee also completed a SOU and paid a \$150 civil penalty.

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 Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

s/ _____
Erick O. Agina, Compliance Officer

s/ _____
Peter Frey Lavalley, Executive Director

cc: Alicia Lasch, Committee Treasurer