



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 (Commission)

From: Jennifer Hansen, Compliance Officer

Date: May 27, 2026

Subject: Citizens for Ridgefield Schools; PDC Case 151075; Reconsideration Hearing

Matter for Review:

During a Brief Enforcement Hearing held April 9, 2026, Citizens for Ridgefield Schools (Respondent) was found to have violated RCW 42.17A.235¹ and RCW 42.17A.240 for failure to timely and accurately file expenditure (C-4) reports. At the April 9, 2026, Brief Enforcement Hearing, an Order imposing a \$1,000 penalty (with \$500 suspended) was entered, which the Respondent now requests the Commission reconsider.

Background:

- 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.
- The Respondent participated in the five elections listed above, was registered under the “Full Reporting” option and was required to file C-4 reports in accordance with the requirements described in RCW 42.17A.235.
- On January 21, 2026, PDC staff emailed and mailed a hearing notice for an April 9, 2025, Brief Adjudicative Proceeding (Brief Enforcement Hearing) to the Respondent’s email address and mailing address of record. **(Exhibit 1)**
- At the April 9, 2026, Brief Enforcement Hearing, the Respondent was found in violation of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately file expenditure (C-4) reports and was assessed a \$1,000 penalty with \$500 dollars suspended if, among other

¹ Effective Jan. 1, 2026, Chapter 42.17A RCW was recodified to Title 29B RCW. Because the events at issue in this case occurred prior to 2026, this memorandum cites to Chapter 42.17A.

conditions, that the Respondent amend all inaccurate C-4 reports identified in the Order within 30 days of service, or by no later than Monday, June 8, 2026.

- Prior to the hearing time on April 9, 2026, the Respondent's new President contacted PDC staff regarding participation in the Brief Enforcement Hearing. PDC staff provided the hearing notice, participation information and the Memorandum to the Commission. The Respondent did not participate in the hearing but did respond to PDC staff indicating they would work on the outstanding action items from PDC Case 151075.
- On May 7, 2026, PDC staff served Respondent an Initial Order from the April 9, 2026, Brief Enforcement Hearing via email to the Respondent's email address of record. **(Exhibit 2)**

Request for Reconsideration:

- On May 11, 2026, the Respondent contacted PDC staff by email, requesting additional time to submit the corrected C-4 reports identified in the Initial Order for PDC Case 151075.
- On May 22, 2026, and May 27, 2026, the Respondent contacted PDC staff by email, requesting a review of the suspended penalty condition related to the time limit on amending all incorrect C-4 reports. **(Exhibit 3)**
- On June 12, 2026, PDC staff served Respondent a hearing notice via email for a June 25, 2026, Reconsideration Hearing before the Commission, along with instructions on how to participate in the hearing remotely. **(Exhibit 4)**

Exhibits

Exhibit 1 – Brief Adjudicative Proceeding Hearing Notice; dated January 21, 2026

Exhibit 2 – Initial Order; Issued May 7, 2026

Exhibit 3 – Written Request for Appeal; received May 22 and 27, 2026

Exhibit 4 – Reconsideration Hearing Notice; dated June 12, 2026

EXHIBIT 1



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January 21, 2026

CITIZENS FOR RIDGEFIELD SCHOOLS
PO BOX 1304
RIDGEFIELD, WA 98642

Also delivered electronically to citizens4rs@gmail.com & asgarddog@msn.com

Subject: Brief Adjudicative Proceeding (Brief Enforcement Hearing) Notice; PDC Case Number 151075

Dear Citizens for Ridgefield Schools:

On the date below, the Public Disclosure Commission (PDC) will hold a Brief Adjudicative Proceeding (Brief Enforcement Hearing) in accordance with RCW 29B.20.030 and RCW 29B.60.020 to determine if you violated RCW 42.17A.235 & .240 for failure to timely & accurately report contributions & expenditures, as alleged in the complaints filed in PDC Case 151075.

Under the Brief Enforcement Hearing rules, the Presiding Officer has the authority to assess a civil penalty in accordance with [WAC 390-37-143](#), a penalty schedule adopted by the Commission ([link to penalty schedule](#)).

Your attendance at the hearing is encouraged but not required.

HEARING INFORMATION

Date and time: Thursday, April 9, 2026, at 1:30 PM (PST)
Place: Remotely from Olympia
Live Audio and Online Transmission
Presiding Officer: J. Leach, Chair, Public Disclosure Commission, or his designee
Authority: 29B RCW and WAC 390

PARTICIPATING IN THE HEARING VIA MICROSOFT TEAMS

The Brief Enforcement Hearing will be recorded. The recording of this proceeding could be posted publicly and is subject to public records request. The Presiding Officer and PDC Staff will attend in-person or remotely via videoconferencing platform.

➤ **PLEASE READ the entire instructions below *prior* to the day of the hearing if you plan to participate via MS Teams.**

Please note that you may be prompted to download the MS Teams app or use a supported browser (Microsoft Edge or Google Chrome) for best performance.

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 1:30 p.m. on April 9, 2026**. 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:

[CLICK TO JOIN](#)

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

If you choose to participate in the hearing remotely, please be aware that you may be waiting in the queue for a unknown period of time while cases are being heard and you may have a limited amount of time to speak. If a lengthier response time is needed, please consider submitting written participation materials prior to the hearing (see below).

SUBMITTING THE REPORT

You are strongly encouraged to complete and submit the required amended report(s) [online](#) so they received by the PDC prior to the hearing. The report(s) must be submitted electronically. See email dated January 21, 2026, for details regarding corrections needed to resolve this matter.

If you have any questions about the hearing process prior to the hearing date, please contact Jennifer Hansen by email at pdc@pdc.wa.gov – and be sure to reference your case number (151075) in the subject line of the email.

Sincerely,

Jennifer Hansen
Compliance Officer

Enclosures

- Brief Enforcement Hearings FAQ

BRIEF ENFORCEMENT HEARINGS – INFORMATION FOR FILERS

Here are the answers to some Frequently Asked Questions about these brief hearings. This FAQ is informational only and should not be considered legal advice.

What is a Brief Enforcement Hearing?

The PDC is responsible for enforcing the State's campaign finance laws. A Brief Enforcement Hearing (also known as a "Brief Adjudicative Proceeding" under the Administrative Procedure Act) addresses compliance with campaign finance reporting requirements when evidence shows the following types of alleged violations may have occurred:

- Failure to file or timely file required reports of financial affairs, campaign contributions and/or expenditures, independent expenditures, or funds spent on lobbying;
- Improper use of public facilities or resources in election campaigns when the value of public funds expended or facilities used was minimal; and
- Infractions of political advertising laws regarding sponsor identification or political party identification.

Brief Enforcement Hearings may be scheduled on other matters as well, if the basic facts are agreed to or are not being contested, and it is anticipated that the likely penalty imposed (if a violation is found) will be \$2,000 or less. The Commission has adopted a penalty schedule for Brief Enforcement Hearings which can be found in the Washington Administrative Code [WAC 390-37-143](#).

A Presiding Officer, who is a PDC Commissioner, will conduct the hearing. PDC Staff will present the case to the Presiding Officer, and you will have an opportunity to explain the circumstances related to the alleged violations. You may do this in person, by telephone, or in writing by email or letter.

Who are the parties involved?

The PDC Staff initiates and investigates possible violations and brings cases forward to the Commission or its Presiding Officer. The person who is alleged to be out of compliance with the law is referred to as the "Respondent."

What do I do to prepare for the hearing?

The brief hearings are informal in nature. You are not required to have an attorney for this hearing. Hearings take place virtually and/or in the PDC meeting room where Commission meetings are held. You need to let the staff know at least five business days before the hearing whether you will be participating online, by phone, in-person or prefer not to participate.

If you are having other people (witnesses) testify on your behalf, they must be available at the hearing, and staff needs to be informed of the number of witnesses and time needed for their testimony when you notify the staff of your participation. The scheduled hearing starting time is the start time for several matters that will be heard by the Presiding Officer, and your case may

not be the first one heard. So you will need to remain available to participate until your case is called.

Waiving your right to participate. If you have submitted nothing in writing prior to the hearing, have made no other arrangements, and you do not appear online, by phone, in-person, or through your legal counsel at the hearing, it will be presumed that you have decided to waive your right to participate at the hearing.

What happens at the hearing?

The Presiding Officer will introduce the participants and explain the procedure for the hearing. The hearing will be recorded.

The Presiding Officer will swear-in PDC Staff for them to present information regarding the alleged violation of law. You will then have an opportunity to testify, which is your opportunity to present information. All testimony by staff, Respondents, and witnesses is given under oath but, if you attend in-person, you are seated at a regular meeting table with a microphone, not in a courtroom. The Presiding Officer may ask you some questions about the information you, PDC Staff, or witnesses have presented. If you have decided to participate in writing instead of online, by phone or in-person, your written information will be considered by the Presiding Officer as part of the hearing materials.

If at any time the Presiding Officer believes the alleged violations are serious enough to merit penalties greater than \$2,000, the Presiding Officer will adjourn the hearing and direct that the matter be scheduled for a hearing before the full Commission at a later time.

How is the decision made?

After considering all the information presented at the hearing, the Presiding Officer will make a decision about the allegation(s) and any appropriate penalty amount. The decision is typically announced orally at the hearing.

The Presiding Officer will use the penalty schedule referred to above that has been adopted by the Commission in rule to determine the appropriate penalty for certain types of violations, taking into account aggravating and mitigating factors.

What happens after my hearing?

A written decision, called an Initial Order, laying out the Presiding Officer's ruling, including the findings and the penalty, will be sent to you. The PDC tries to get orders issued within 10 days if possible, and not later than 30 days. If a monetary penalty is imposed in the Initial Order, the penalty must be paid within the time frame stated in the Order.

Along with your Initial Order, you will also receive information about your appeal rights, including how to request review or reconsideration by the full Commission if you disagree with the Initial Order. Follow these procedures carefully if you wish to appeal. If there is no appeal before the PDC, the Initial Order becomes a Final Order, and further appeals must be made in Superior Court.

What are the rules that apply to the procedures of my hearing?

The PDC's laws and rules are available on the PDC's website at www.pdc.wa.gov. The laws are in the Revised Code of Washington [Title 29B RCW](#). The rules are in the Washington Administrative Code [\(WAC\) Title 390](#). Brief Adjudicative Proceedings are described at [WAC 390-37-140](#) through [390-37-150](#) and in the Administrative Procedure Act (APA) at [RCW 34.05.482-494](#).

EXHIBIT 2



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A¹

CITIZENS FOR RIDGEFIELD
SCHOOLS,

Respondent.

PDC Case 151075

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

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to Citizens for Ridgefield Schools (the Respondent) on January 21, 2026, a brief adjudicative proceeding was held on April 9, 2026, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately file expenditure (C-4) reports.

The hearing was held in accordance with Chapters 34.05 RCW, Title 29B RCW and Chapter 390-37 WAC. Commission Chair J. Leach was the Presiding Officer. The Commission staff was represented by Jennifer Hansen, Compliance Officer. The Respondent did not participate in the hearing.

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

FINDINGS OF FACT

1. 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.
2. 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](#)).

¹ Effective Jan. 1, 2026, Chapter 42.17A RCW was recodified to Title 29B RCW. Because the events at issue in this case occurred prior to 2026, this SOU cites to Chapter 42.17A.

3. The Respondent has a carry forward discrepancy from the last C-4 report ([110217164](#)) for the April 23, 2024, special election to the first C-4 report ([110268961](#)) for the February 11, 2025, special election.
4. 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.
5. 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.
6. 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.
7. The Respondent failed to include expenditure details for political advertising expenses disclosed on the C-4 report ([110071505](#)) covering January 18 – 31, 2022.
8. 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.
9. 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 a Sticker Mule expense.
10. 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.

11. The Respondent has one prior violation in PDC Case 122205 and signed a Statement of Understanding acknowledging 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.

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.235 and RCW 42.17A.240 for failure to timely and accurately file expenditure (C-4) reports.

ORDER

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

1. **IT IS HEREBY ORDERED that the Respondent is assessed a total civil penalty of \$1,000, in accordance with the penalty schedule set forth in WAC 390-37-143.**
2. **It is further ordered that \$500 of the \$1,000 penalty is suspended on the following conditions:**
 - a. **The Respondent pays the \$500 non-suspended portion of the penalty within 30 days of this Order.**
 - b. **The Respondent amends all inaccurate C-4 reports within 30 days of this Order.**
 - c. **The Respondent does not commit any further violations of Title 29B RCW or Title 390 WAC with 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.**
3. **It is further ordered that, if the Respondent fails to comply with any of the above conditions:**
 - a. **The full \$1,000 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 proceeding as authorized by RCW 29B and 390 WAC.**

Finding, Conclusions & Order
Citizens for Ridgefield Schools
PDC Case 151075

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

Entered this 7th day of May, 2026.

Public Disclosure Commission

Electronically Signed

Peter Frey Lavalley
Executive Director

I, Jennifer Hansen, certify that I mailed and emailed a copy of this order to the Respondent at their respective address postage pre-paid, and by email on the date stated herein.

Electronically Signed Jennifer Hansen
Signed

5/7/2026
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 orally or in writing, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1). Staff may ask for written confirmation of oral requests for review.
- **REQUESTS FOR REVIEW MUST BE RECEIVED AT THE COMMISSION OFFICE WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE POSTMARK DATE OF THIS INITIAL ORDER.** Written requests for review should be delivered or mailed to the Washington State Public Disclosure Commission, 711 Capitol Way, Room 206, Box 40908, Olympia, WA 98504-0908.

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(5).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.552.

EXHIBIT 3

[Kelliana](#) replied

Fri, 22 May 2026 at 1:11 PM

To:"PDC Support" <pdcc@pdcc.wa.gov>

Cc:taralnathan@gmail.com, citizens4rs@gmail.com

Yes, we would like to request a review. Is the review something we will attend?

Thank you!

Kelliana Cole

[Kelliana](#) replied

Wed, 27 May 2026 at 3:35 PM

To:"PDC Support" <pdcc@pdcc.wa.gov>

Cc:taralnathan@gmail.com, citizens4rs@gmail.com

Hello,

Attached is Citizens for Ridgefield Schools' formal request for review regarding the Initial Order in PDC Case 151075.

As current leadership, we are actively working through the amendment process and gathering as much historical information as possible. We inherited incomplete and disorganized records from prior election cycles, so part of this work has involved reconstructing activity from bank records and other documentation we still have access to.

We are committed to addressing these issues and improving our compliance processes moving forward. At the same time, we are trying to better understand expectations around amendments tied to records that may no longer exist or cannot be fully verified.

A few questions we are hoping to better understand as we move through this process:

- If we are unable to fully reconstruct every historic filing despite good-faith efforts, does the suspended portion of the penalty automatically become due?
- Is there flexibility for committees that inherited incomplete records from prior leadership?

- Would the PDC prefer best-effort amendments with explanatory notes in situations where records cannot be fully verified?
- Is additional time ever granted in situations involving large-scale historical reconstruction by volunteer-led organizations?

We appreciate your time and guidance as we work through this process.

Thank you,

Kelliana Cole

President, Citizens for Ridgefield Schools

EXHIBIT 4



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June 12, 2026

PDC CASE 151075

Sent Electronically to Citizens for Ridgefield Schools at citizens4rs@gmail.com;
kelliana@me.com & taralnathan@gmail.com

HEARING NOTICE

Respondent:	Citizens for Ridgefield Schools
Hearing/meeting date:	Thursday, June 25, 2026
Time:	10:15 a.m.
Place:	Remotely from Olympia/ Join the meeting now Evergreen Plaza Building/address
Presiding Officer:	The Public Disclosure Commission
Authority:	Title 29B RCW and WAC 390

The Public Disclosure Commission (PDC) received your request for an appeal of the Initial Order issued in the case cited above. Your request for review under WAC 390-37-150 was received on May 22 and May 27, 2026, which is within 21 days of the Initial Order issued May 7, 2026. It is scheduled to be heard before the full Commission in accordance with RCW 29B.20.030 and RCW 29B.60.020 at the date and time listed above.

The start time of the hearing is approximate and may be delayed based on other business of the Commission, however, the hearing will not occur prior to 10:15 a.m. As a courtesy, staff will attempt to notify you by email of any change to the start time greater than 30 minutes.

You are not required by law to personally attend. However, the PDC recommends that respondents personally appear whenever possible, which includes participating via teleconference. Please contact PDC staff if you would like to appear virtually.

Sincerely,

Jennifer Hansen
Compliance Officer

PLEASE READ THE ENTIRE INSTRUCTION Prior to joining the meeting

How to participate remotely in the Washington State Public Disclosure Commission Meeting on 05/28/26/2026:

Note the meeting agenda for start time. [Home | Washington State Public Disclosure Commission \(PDC\)](#)

You may be prompted to download MS TEAMS App or use a supported browser: Microsoft Edge or Chrome for best performance.

Please remember to **Mute** yourself and turn your **camera off** when you are not talking.

Microsoft Teams meeting info for (04/23/2026)

Join on your computer, mobile app or room device

[Join the meeting now](#)

Meeting ID: 260 632 893 909 69

Passcode: wj2LM7Rc

or

copy and paste the following into your browser:

https://teams.microsoft.com/l/meetup-join/19%3ameeting_NDY1NTUyOTAtNjA5Zi00Mzk0LWI4YmMtMGQwODMwZWU4YTNI%40thread.v2/0?context=%7b%22Tid%22%3a%2211d0e217-264e-400a-8ba0-57dcc127d72d%22%2c%22Oid%22%3a%22d6333694-631f-41cb-93db-a8c6f065da71%22%7d

Meeting ID: 260 632 893 909 69

Passcode: wj2LM7Rc

TO call in (audio only)

Dial in by phone

[+1 564-999-2000,,607031933#](#) United States, Olympia

[Find a local number](#)

Phone conference ID: 607 031 933#

If you are calling in via phone, **use*6 to mute and unmute**

The Public Comment period time will be noted on the agenda.

If you have contacted staff prior to the meeting to be on the Public Comment list, you will be called by name to give your comment.

Materials related to public comment portion must be submitted by **Tuesday, 06/23/2026, 5:00 pm** to allow for distribution to the Commission and staff for review.

For assistance prior to the start of the meeting contact 1-360-753-1111.