



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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February 8, 2017

The Honorable Robert Ferguson
Attorney General
1125 Washington St SE
PO Box 40100
Olympia, WA 98504-0100

RE: Public Disclosure Commission Recommendation Following Staff Investigation Review of Service Employees International Union Local 775, PDC Case 13283

Dear Attorney General Ferguson:

This letter concerns the matter that your office referred to the Public Disclosure Commission for review and possible investigation on January 5, 2017 in response to a 45-day Citizen Action Complaint (Complaint) filed with the Attorney General on December 15, 2016. The Complaint alleged that Respondent, Service Employees International Union Local 775 (SEIU 775), violated RCW 42.17A because it has an expectation of receiving contributions and making expenditures in support of, or in opposition to, candidates or ballot propositions. The complaint alleged that as a political committee, SEIU 775 has failed to register and report with the PDC. (RCW 42.17A.205, .235, and .240)

PDC staff reviewed the Complaint and conducted an investigate review of the allegations made against SEIU 775 in the Citizen Action Letter and prepared an Investigative Review Memorandum with Recommendations and Exhibits. Note – the Investigative Review Memorandum inadvertently listed the PDC Case as 12270, when it should have been listed as 13283.

The Commission considered the results of staff's investigative review at a special Commission meeting held on February 8, 2017, where PDC staff presented its findings which included a recommendation regarding the allegations listed in the Complaint. A copy of the Investigative Review Memorandum with Exhibits is enclosed with this letter.

Staff Conclusion

As noted in the attached Investigative Review Memorandum with Exhibits, staff concluded that:

Based on the factors identified in staff's investigative review of the allegations listed in the Complaint, staff has determined that SEIU 775 does not appear to be a political committee with a requirement to register and report with the PDC.

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SEIU 775 did not violate RCW 42.17A.205, .235, and .240 because: (1) It is not a "receiver of contributions" in support of, or in opposition to candidates or ballot propositions; and (2) Supporting candidates or ballot propositions is not one of its primary purposes.

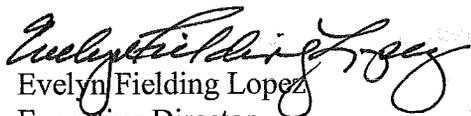
Finally, SEIU 775 has a political committee SEIU Healthcare 775NW Quality Care Committee, which has been registered and reporting with the PDC dating back to 2005.

Commission Recommendation

The Commission voted unanimously to accept staff's recommendation, and to recommend that no further action be taken on the Citizen Action Complaint filed against Service Employees International Union Local 775.

If you have questions, please contact me at (360) 664-2735. Thank you.

Sincerely,


Evelyn Fielding Lopez
Executive Director

Enclosure

cc: Commissioners
Linda A. Dalton, Sr. Assistant Attorney General
David Dewhirst and James Abernathy, Counsel, Freedom Foundation
Dmitri Iglitzin, Counsel, SEIU Local 775

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