



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

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MEMORANDUM

TO: Members, Public Disclosure Commission

FROM: Susan Harris, Assistant Director 

DATE: October 14, 2004

RE: Report on 45-Day Letter Submitted by Evergreen Freedom Foundation
Against the Washington State Labor Council

On September 1, 2004, Jami Lund, on behalf of the Evergreen Freedom Foundation (EFF), filed a 45-day letter with the Office of the Attorney General alleging that the Washington State Labor Council (WSLC) violated several provision of the Public Disclosure Law. That same day, the letter was delivered to PDC staff for investigation.

The complaint alleges that the WSLC violated the following:

1. RCW 42.17.100 and 42.17.550 by failing to report independent expenditures,
2. RCW 42.17.640 by exceeding contribution limits,
3. RCW 42.17.128 by using public funds to affect elections,
4. RCW 42.17.040 through 42.17.080 by failing to register and report as a political committee,
5. RCW 42.17.640 and 42.17.660 by creating a second "illegally hidden" political committee,
6. RCW 42.17.670 and 42.17.730 by failing to report earmarked contributions,
7. RCW 42.17.760 by using non-member fees to affect elections.

Alleged Violation 1: RCW 42.17.100 and 42.17.550

A.

The complaint alleges that the WSLC is not a labor organization and therefore cannot claim the exemption of "internal political communications" when engaged in a "massive communication" effort that supported or opposed candidates and ballot issues.

According to RCW 42.17.100, independent expenditures do not include internal political communications primarily limited to members of a labor organization or other membership organization. The WSLC does not maintain that their political activities were done without the encouragement of or collaboration with the candidates involved.



However, it does maintain that there was no reporting obligation because the activity was directed to members.

EFF argues that the individual union members are not members of the WSLC.

The WSLC considers itself a labor organization. EFF believes otherwise. However, whether or not it is a labor organization is irrelevant in determining whether its communications were distributed primarily to members, because the WSLC is an organization which has dues paying members. Unions pay membership dues to the WSLC in the form of a per capita assessment.

The WSLC has produced political advertising, conducted door-to-door campaigns to distribute political literature to union members, mailed political literature to union households, and engaged in phone banks in support of candidates to union households.

In 1995, the Commission adopted Interpretation 95-04, Internal Political Communications of Membership Organizations. The interpretation states that "if a membership organization and its members satisfy the criteria regarding 'membership organizations' and 'members' established by the Federal Election Commission (FEC) in 11 CFR 100.8(b)(4), the Public Disclosure Commission will consider the organization and its members as qualifying for the exemption in RCW 42.17.020(14)(b)(v)..."

RCW 42.17.020(14)(b)(v) specifies what is not a contribution. At the time the interpretation was adopted, efforts were concentrated on implementing contribution limits. Since the language in RCW 42.17.020(14)(b)(v) that exempts "internal political communications" from the definition of "contribution" is identical to the language in RCW 42.17.100 that exempts "internal political communications" from the definition of "independent expenditure", the interpretation should uniformly apply to both.

The FEC regulation includes the following language: "...members of a local union are considered to be members of any federation with which the local, national, or international union is affiliated."

Since the WSLC has communicated primarily with union members or union households, the activity does not qualify as an independent expenditure, or in the alternative, a contribution to the candidates or ballot issues supported or opposed by the WSLC.

B.

The complaint also alleges that the WSLC included retired union members in the group targeted for its communication effort. No evidence was provided or obtained to demonstrate that the WSLC targeted retired union members. Twice a year, the WSLC obtains updated member lists from each member union. The WSLC compares those lists with its list of members and removes any individual who is no longer a union member.

C.

Finally, the complaint alleges that the WSLC trained volunteers to assist in their door-to-door efforts. The WSLC has trained union members on a variety of issues. The unions who send representatives to the training pay for the training.

Staff Recommendation: Alleged violation 1 has not been substantiated and merits dismissal.

- A. The WSLC communicated with individuals who are considered members pursuant to Interpretation 95-04.
- B. There was no evidence that the WSLC communicated with retired union members.
- C. The WSLC did not expend its own funds to pay to train volunteers to assist with its campaigning effort. Unions always pay for the WSLC training their members receive.

Alleged Violation 2: RCW 42.17.640

The complaint alleges that the WSLC exceeded contribution limits when it gave funds to candidates who were also supported financially by some unions.

Staff Recommendation: Alleged violation 2 has not been substantiated and merits dismissal.

The WSLC does not share limits with each union simply because the unions are members of the WSLC. The complainant failed to provide evidence that any of the factors in WAC 390-16-309(3) were satisfied.

Alleged Violation 3: RCW 42.17.128

The complaint further alleges that the WSLC used public funds to affect elections. EFF speculates that these funds were co-mingled with general funds, and if they were, the funds were used for political purposes.

Staff Recommendation: Alleged violation 3 has not been substantiated and merits dismissal.

The WSLC receives grants from public agencies. Each grant is kept in a separate bank account and not co-mingled with other funds. No public funds were used for political purposes.

Alleged Violation 4: RCW 42.17.040 – 42.17.080

The complaint alleges that the WSLC is a political committee, since one of its purposes is to engage in “significant election-affecting” activities. It bases this allegation, in part, on the fact the WSLC has listed as one of the services it provides as “political action.” It also states that the WSLC’s expenditures are “significant and must be calculated in determining the percentage of the WSLC’s activities that are dedicated toward election-affecting purposes.”

In State of Washington, ex rel. Evergreen Freedom Foundation v. Washington Education Association, No. 25272-4-II, the Court of Appeals said that any analysis used to determine primary purpose of an organization should not be applied as a formula. It said that one should evaluate the stated goals and mission of the organization and whether the organization’s actions further its stated goals, and whether the goals of the organization would be substantially achieved by a favorable outcome in an election.

The WSLC has six major programs it engages in. The political program, or COPE, does not encompass a majority of WSLC’s activities. Most of the other programs are not related to its political activities. Of its expenditures in fiscal year 2001 and 2003, less than 14% was spent on activities that supported or opposed candidates or ballot issues. Except for 2002, less than 15% of hours worked by all employees of the WSLC are attributed to supporting or opposing candidates or ballot issues. In 2002, the amount was slightly higher when they hired temporary workers to assist on a project.

Diane McDaniel, Political Director for COPE, states that she spends approximately 40% of her time on activities that support or oppose candidates or ballot issues. The remainder of her time is spent on developing voter registration programs and materials, assisting member unions with compliance with PDC and FEC rules and regulations, maintaining a current membership list of AFL-CIO members in Washington.

In answering this allegation, Jim Oswald, counsel for the WSLC, said “The importance of elections is that they alter the environment in which the WSLC attempts to achieve its stated goals, and thus make it more or less difficult to achieve those goals...Regardless of the outcome of elections, the WSLC would continue to pursue its goals and missions. This is because WSLC is not a political organization. It is a labor organization that participated in the political process as one of many ways that it advances its stated goals and missions.”

Staff Recommendation: Alleged violation 4 has not been substantiated and merits dismissal.

The Court of Appeals made it clear that if a majority of an organization’s activity was not devoted to supporting or opposing candidates or ballot issues, one must evaluate whether the organization’s goals and mission would be achieved by a favorable outcome in an

election. The WSLC's goals are to bring together all unions and act harmoniously in matters affecting the unions and their members.

As counsel stated, the WSLC would continue to pursue its goals and mission regardless of the outcome of an election. The WSLC would continue to be in existence even if it were not engaged in the political process.

Alleged Violation 5: RCW 42.17.640 and 42.17.660

The complaint alleged that the WSLC and its political committee created another political committee in an attempt to circumvent contribution limits.

Some employees of the WSLC are members of the Office and Professional Employees International Union Local 8. Some of these employees were not happy with the choice of candidates supported by their union. They formed their own political committee to make contributions to candidates of their choosing.

Staff Recommendation: Alleged violation 5 has not been substantiated and merits dismissal.

SIC-PAC does not have overlapping membership with WSLC, nor does the WSLC or its officers have a significant role in the formation or operation of SIC-PAC. SIC-PAC was not established, maintained or controlled by the WSLC.

Alleged Violation 6: RCW 42.17.670 and 42.17.730

The complaint alleged that the WSLC earmarked funds provided to SIC-PAC for candidates who had already received the maximum contribution from WSLC. The complaint also alleges that the WSLC gave funds to the Washington State Democratic Central Committee (WSDCC) earmarked for specific candidates.

The WSLC gave no contributions to SIC-PAC, but did give funds to both the exempt and non-exempt funds of the WSDCC. Diane McDaniel and Paul Berendt, Chair of the WSDCC, both confirmed that contributions received from the WSLC were not earmarked for specific candidates.

Staff Recommendation: Alleged violation 6 has not been substantiated and merits dismissal.

No evidence was provided that the WSLC earmarked contributions through either SIC-PAC or the WSDCC.

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Alleged Violation 7: RCW 42.17.760

The complaint alleged that the WSLC used non-member, or agency shop fees for political purposes. The complaint indicates that unless WSLC segregated those funds, they may have been used for political purposes.

The WSLC receives its funding from the per capita assessment placed on its member unions. The per capita amount is based on the number of members in each union.

The complainant provided no evidence that any agency fee money was included in the per capita amount sent to the WSLC or that it had used the funds for political purposes.

Staff Recommendation: Alleged violation 7 has not been substantiated and merits dismissal.

Staff contacted two unions and was informed that these unions calculated the per capita payment on membership only, and did not include non-members or retired members into the count.



November 3, 2015

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ATTORNEY GENERAL
STATE OF WASHINGTON
OSE/OLYMPIA

Dear Messrs. Ferguson, Satterberg, and Tunheim,

I write pursuant to RCW 42.17A.765(4) to report multiple violations of the Public Disclosure Act (“PDA”), RCW 42.17A, by the Washington State Labor Council AFL-CIO (“WSLC”), and by Jeff Johnson and Lynne Dodson in their respective capacities as President and Secretary-Treasurer of WSLC, respectively (“WSLC officers”).

The first violation. WSLC is a political committee pursuant to RCW 42.17A.005(37). The organization both expects to receive contributions and make expenditures to support or oppose candidates or ballot propositions. It is also a primary purpose of WSLC to support and/or oppose candidates and/or ballot propositions. See *Utter v. Bldg. Indus. Ass'n of Washington*, 182 Wn.2d 398, 427 (2015). As a political committee, WSLC has failed to file with the Public Disclosure Commission (“PDC”) a “statement of organization” required for all political committees. RCW 42.17A.205(1).

WSLC, as a political committee, also violated RCW 42.17A.235 by failing to file mandatory reports including summaries of monetary contributions and receipts of expenditures. Sufficient evidence of WSLC’s extensive but unreported political contributions and expenditures exist in C3 and C4 reports filed by other political committees, including WSLC’s own continuing political committees.

The second violation. WSLC, as a lobbyist employer, violated RCW 42.17A.630 by failing to file legally required reports detailing its monetary and in-kind contributions to political

committees. At least **\$403,750.92** worth of monetary expenditures by WSLC remains unreported to the PDC. Further, WSLC failed to file at least **\$122,255** of in-kind contributions to its continuing political committees, and has possibly neglected to file in-kind contributions to other political committees.

A. Violations of RCW 42.17A.205 and RCW 52.17A.235.

WSLC is organized as a non-profit labor organization. WSLC is not a union, however, and is not the bargaining representative for any employees. Its sole purpose is political, and much of its activity constitutes electioneering. Furthermore, by its own statements and conduct, it is **also** a political committee under Washington law. RCW 42.17A.005(37) sets forth the definition of political committee:

"Political committee" means any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.

In *Utter v. BIAW*, 182 Wn.2d 398, 427 (2015), the Washington Supreme Court adopted an additional "primary purpose" test that an organization must satisfy before it may be considered a "political committee" under RCW 42.17A.005(37). This additional test requires that "electioneering" be "a primary purpose" of an organization. *Id.* at 426.¹ (Emphasis added.) If an entity is a political committee, then it must meet regular reporting requirements set forth in the PDA.

RCW 42.17A.005(37) sets forth two independent ways an organization may be considered a political committee. First, the organization must have the expectation of receiving contributions in support of or opposition to any candidate or ballot proposition. Evidence found in various political committees' C4 reports show that WSLC expects to and does receive contributions to that end. Second, a person or organization is a political committee if it has the expectation of making expenditures in support of or opposition to candidates or ballot propositions. Under this expenditures test, one of the organization's primary purposes must also be to use these expenditures to support or oppose candidates or ballot propositions. WSLC's own stated goals and mission constitute evidence this primary purpose test is satisfied. In addition, the C3 reports of other political committees show the expenditures of WSLC supports WSLC's goals.

An appropriate framework for determining if electoral political activity is one of an organization's primary purposes includes an examination of the stated goals or mission of the organization and whether electoral political activity is a primary means of achieving these goals or mission. *State ex el. Evergreen Freedom Foundation v. Washington Education Ass'n*, 111

¹ The *Utter* Court used "electioneering" as abbreviated shorthand for the statutory definition of a political committee in RCW 42.17A.005(37): "having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition." The *Utter* Court also used the phrases "influence[ing] the political process," *Utter*, 182 Wn.2d at 414, "to affect, directly or indirectly, governmental decision making by supporting or opposing candidates or ballot propositions," *Id.* at 423, and "influencing an election," *Id.* Thus, all organizations which satisfy the *Utter* primary purpose test also satisfy RCW 42.17A.005(37). This letter may reference each of these phrases.

Wn.App. 586, 599-601 (2002). WSLC's stated mission and core programs are found in several locations on its website. First, it declares the core programs to be "legislative advocacy, political action, communications and media relations, and assistance with organizing campaigns." See **Exhibit 1**.² WSLC provides these political services to unions and others. See **Exhibit 2**.³ For instance, the "What's New" page of WSLC's website states that "As a state federation of the AFL-CIO, the Washington State Labor Council provides many services to its affiliated unions, with a focus on legislative advocacy, political action, communications, and organizing support." WSLC's conduct demonstrates that it uses electioneering to further these broad categorical goals.

Additional explanations of support offered to affiliated unions can be found on WSLC's "Services" page. See **Exhibit 3**.⁴ Under "Political Action," it states "The WSLC's political education program, considered a national model by the AFL-CIO, offers instruction and assistance for unions interested in voter registration drives, candidate training for union members, establishing and building political action funds, and communication with members via mail, phone and worksite leafleting." *Id.*

WSLC's own statements and actions demonstrate that electoral political activity is one of the organization's primary purposes. Its website includes several examples of the efforts that support this primary purpose. One such example is on the "Coming Events" page. See **Exhibit 4**.⁵ On this page, WSLC advertises its 2016 Legislative Lobbying Conference in Olympia and its Constitutional Convention in Wenatchee. Further, WSLC's "Legislative Voting Records" page contains a link to Legislative Voting Records from 2000 through 2015. See **Exhibit 5**.⁶ The Legislative Voting Record includes Senate and House voting records. The Senate voting record for 2015, for example, shows how each state senator voted "right" or "wrong" according to the standards set by WSLC. See **Exhibit 6**.⁷ The bottom of the page also gives voting descriptions for certain senate bills. In addition, the House voting record demonstrates whether the state representatives voted "right" or "wrong," their WSLC lifetime voting record, and descriptions of house bills. See **Exhibit 7**.⁸ WSLC's use of "right" and "wrong" indicates its support and/or opposition of particular elected officials and candidates.

Also on its website, WSLC advertises its annual convention and displays its resolutions. These resolutions include support of and opposition to candidates and ballot propositions. See **Exhibit 8**.⁹ Resolution #1 shows that WSLC vows to take action and perform the necessary steps to create an initiative and specifically resolves to "urge members to support the "WAmend" effort to obtain the number of signatures necessary to qualify Initiative 735 as an initiative to the legislature," "support I-735 during the legislation session," and "support campaign efforts in educating voters." See **Exhibit 9**. In Resolution #2, WSLC supports repealing an amendment and says "the Washington State Labor Council, AFL-CIO, will encourage its affiliates to adopt this resolution and work to take legislative action to amend or repeal I-200..." See **Exhibit 10**. Next,

² See also <http://www.wslc.org/whoweare.htm> (last visited Oct. 19, 2015).

³ See also <http://www.wslc.org/news.htm> (last visited Oct. 13, 2015).

⁴ See also <http://www.wslc.org/services/index.htm> (last visited Oct. 19, 2015).

⁵ See also <http://www.wslc.org/upcoming.htm> (last visited Oct. 19, 2015).

⁶ See also <http://www.wslc.org/legis/votrec.htm> (last visited Oct. 19, 2015).

⁷ See also <http://www.wslc.org/legis/vr-sen15.htm> (last visited Oct. 19, 2015).

⁸ See also <http://www.wslc.org/legis/vr-hou15.htm> (last visited Oct. 19, 2015).

⁹ See also <http://www.wslc.org/00resolu.htm> (last visited Oct. 19, 2015).

WSLC reveals its desire to create a publically owned state bank and resolves to “convene a study group to examine the possibility of sponsoring an initiative of the people for the 2016 general election...” See **Exhibit 11**.

Further, WSLC promises to send Resolution #15 to Congressional members and resolves to stop supporting those members if they did not vote the way WSLC desires. See **Exhibit 12** (WSLC states “...during our future candidate endorsement process for Congress, we will take into account this vote and shall have a discussion on whether we continue to support any incumbent”). WSLC states in Resolution #18 that it will “lead the fight [for fair revenue] politically, by supporting legislation and *candidates* that support a fair revenue solution...” See **Exhibit 13** (emphasis added).

Additionally, WSLC states in Resolution #22 that it and “its affiliates, through their legislative and political action committees, work to support legislation and other activities that would make postage for return ballots prepaid.” See **Exhibit 14**. WSLC’s statements and conduct in other contexts (much of which is cited herein) show that “other activities” includes supporting and/or opposing candidates and/or ballot initiatives.

The above-mentioned resolutions by no means represent all support of candidates and/or ballot propositions, but merely depict a portion of WSLC’s own stated support of candidates and/or ballot propositions.

WSLC also specifically endorses candidates and initiatives on its “Political Education” page. See **Exhibit 15**.¹⁰ Specifically, WSLC states that it “has endorsed Carol Gregory in the special election for 30th District State Representative.” *Id.* WSLC shows its opposition to yet another initiative when it says, “WSLC is also urging No on Initiative 1366, Tim Eyman’s latest ballot measure...” *Id.* WSLC provides further evidence of its electioneering agenda when it says, “WSLC only makes endorsements in state legislative and statewide races. To find out who labor’s endorsed candidates are for county, city and other local positions, contact your area AFL-CIO Central Labor Council.” *Id.* Finally, WSLC encourages members to donate to its continuing political committee, WSLC DIME PAC. They state WSLC DIME PAC’s mission is to “recruit and elect champions of Washington’s working families.” *Id.*

WSLC’s own statements exemplify its political electoral goals and that it seeks to further those goals through its electoral activities. In addition, multiple C3 reports filed by a variety of committees which support or oppose candidates and/or ballot initiatives, including WSLC’s own political committees, confirm that the expenditures made by WSLC are a primary means to further its electoral goals. An example of WSLC’s expenditures that support its electoral goals includes its **\$100,000** contribution in 2010 to No on I-1082 Committee. See **Exhibit 16**. WSLC also gave **\$25,000** and **\$50,000** donations that same year to the same committee, totaling **\$175,000** in one year to one ballot initiative. See **Exhibits 17 and 18**.

WSLC also expends large amounts of money on its continuing political committees, WSLC DIME PAC and WSLC PPP Committee. These donations total **\$27,224** for WSLC DIME PAC and **\$111,876.92** for WSLC PPP Committee from January 2010 to present. See **Exhibits 19 and**

¹⁰ See also <http://www.wslc.org/cope/index.htm> (last visited Oct. 19, 2015).

20. WSLC's contributions to these political committees are expenditures in support of or opposition to the candidates and/or ballot propositions supported and/or opposed by those political committees. Doing so reflects the fact that WSLC expects to receive contributions and make expenditures in support of or opposition to candidates or ballot initiatives.

Finally, upon information and belief, WSLC employees spend significant time supporting and/or opposing candidates and/or ballot propositions while being compensated by WSLC. This compensation constitutes expenditures by WSLC in support of and/or opposition to candidates and/or ballot propositions, and should be thoroughly investigated. (*In the least*, this would violate PDA provisions related to lobbyist-employers if WSLC donated unreported employee time to a political committee. See below.)

WSLC meets the definition of a political committee in RCW 42.17A.00(37). WSLC also satisfies the primary purpose test set forth in *State ex el. Evergreen Freedom Foundation v. Washington Education Ass'n*, 111 Wn. App. 586, 598-603 (2002) and *Utter v. BLAW*, 182 Wn.2d 398, 427 (2015). By failing to report a statement of organization as a political committee, WSLC neglected to meet its reporting requirements set forth in the PDA. RCW 42.17A.205.

As a political committee, WSLC is required to submit monthly reports of every contribution received and expenditure made. RCW 42.17A.235. WSLC failed to meet its requirements under RCW 42.17A.235, *some* evidence of which is below (though not all).

C3 reports of other political committees showing money contributed by WSLC to political committees indicates WSLC failed to report at least **\$403,770** in expenditures from 2010 to 2015. See **Exhibit 21**. These expenditures were given to its continuing political committees, both the WSLC DIME PAC and the WSLC PPP Committee, other political committees, candidates running for office, and initiative support groups. WSLC neglected to report **\$27,224 given to WSLC DIME PAC, \$111,876 given to WSLC PPP Committee, \$119,650 given to other political committees or candidates, and \$145,000 given to support initiatives**. *Id.* These categories clearly reflect that WSLC continually expects to and is making expenditures in support of and/or in opposition to candidates and/or ballot initiatives, and is therefore required to report these expenditures to the PDC.

Further, the C4 reports of other political committees show that **\$225,835.39** has been given to WSLC from 2010-2015. See **Exhibit 22**. Most of these contributions or in-kind contributions have not been reported by WSLC. **WSLC DIME PAC contributed \$109,754.39 to WSLC and WSLC PPP Committee contributed \$12,501 to WSLC**. *Id.* Other political committees contributed **\$103,580**. *Id.* In their C4 reports, WSLC DIME PAC and WSLC PPP Committee reported in-kind donations to WSLC in the form of wage reimbursements, postage, tax payments, salary and benefits, supplies, printing, and legal and accounting services, to name a few. See **Exhibit 23** for an example of an in-kind contribution. WSLC has not reported most of these in-kind contributions.

Additionally, every political committee must timely file these regular monthly reports with the PDC detailing each contribution received and expenditure made, which the WSLC failed to do. RCW 42.17A.235.

B. Violation of RCW 42.17A.630.

WSLC violated, and continues to violate, RCW 42.17A.630. RCW 42.17A.630(2) requires a lobbyist employer to file monthly reports detailing its monetary and in-kind contributions totaling more than \$110 to candidates, elected officials, officers of public agencies, or political committees. Lobbyist employers are required to submit these monetary and in-kind contributions on either an “Employer of Lobbyist Monthly Political Contribution Report,” also known as an L-3c, or on its lobbyists’ L2 reports. WSLC engages in lobbying activity and is therefore considered a lobbyist employer. The PDC lists the lobbyists’ L2 reports from 2010-2015 that show compensation from WSLC. *See Exhibit 24.* As a lobbyist employer, WSLC fails to file reports detailing all monetary and in-kind contributions to candidates, elected officials, officers, or political committees.

The C3 reports filed by political committees document WSLC’s contributions to political committees. Based on reports from 2010-present, WSLC gave **\$12,775 to candidates** and **\$390,995 to political committees.** *See Exhibit 25.* WSLC reported none of these contributions on any L-3c or L-2 reports. Thus, WSLC violated RCW 42.17A.630 by failing to report at least **\$403,770** in monetary contributions from 2010 to present.

In addition, WSLC DIME PAC and WSLC PPP Committee reimbursed WSLC for wages, benefits, supplies, postage, and legal services, indicating that WSLC has made extensive in-kind contributions to at least its own continuing political committees—and likely many others. From 2010 to the present, WSLC DIME PAC reimbursed WSLC a total of **\$109,754** for in-kind contributions. *See Exhibit 26.* Likewise, over the same period, WSLC PPP Committee reimbursed WSLC for in-kind contributions totaling **\$12,501.** *See Exhibit 27.* WSLC’s failure to report these and additional in-kind contributions on its L-3c or L2 reports demonstrate extensive and ongoing violations of Ch. 42.17A RCW.

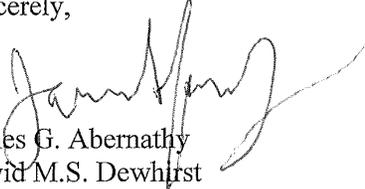
RCW 42.17A.630(2) requires lobbyist employers to file monthly reports detailing any and all monetary or in-kind contributions of more than \$110 to candidates, elected officials, officers of public agencies, or political committees. As indicated above, WSLC has made numerous monetary and in-kind contributions exceeding \$110 to candidates and political committees, but failed to file the reports required by § 630(2). This failure constitutes a violation of RCW 42.17A.630.

C. Conclusion.

As explained above, WSLC violated and continues to violate numerous portions of the Public Disclosure Act, Ch. 42.17A RCW. This Citizen Action Notice provides only some of the evidence demonstrating WSLC’s violations. We respectfully request that the Washington Attorney General’s Office and/or the county prosecuting attorneys investigate these violations as expeditiously and efficiently as possible. The Freedom Foundation understands these investigations take time. As a courtesy the Foundation agrees to waive its right to bring a citizen action (in the absence of governmental action) until, at the earliest, the 75th day after the date of this letter.

Please do not hesitate to contact me at 360.956.3482 or
JAbernathy@myfreedomfoundation.com if I can be of assistance. Thank you.

Sincerely,



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December 14, 2015

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RE: Complaint from The Freedom Foundation
PDC Case No. 1543
SCBIL File No.: 2800-054

Dear Mr. Perkins:

We write to you on behalf of our client, the Washington State Labor Council (“WSLC”), in response to the letter we received from you on November 23, 2015, regarding a 45-day Citizen Action Letter filed by The Freedom Foundation (“FF”) with the Washington Attorney General’s office on November 4, 2015 (“Complaint”).

Given the short timeline within which you have asked us to submit a written response to your letter, this reply will of necessity be brief and summary in nature. However, save as specifically noted below, we believe that even a cursory examination of the allegations being made by FF, in light of applicable law, reveals that those allegations are without merit.

Washington State Labor Council is not an unregistered political committee.

This is the second time in the past 11 years that FF, previously known as the Evergreen Freedom Foundation, has alleged that WSLC is an unregistered political committee. The FF first made this allegation in September of 2004.¹ As a result of the FF’s allegations, the PDC at that time conducted an extensive investigation into the activities and nature of WSLC,² and the Commission subsequently accepted its staff’s recommended finding that WSLC was *not* an unregistered political committee, because WSLC’s goals were to bring together all unions and act harmoniously in matters affecting the unions and their members, not to support and oppose candidates or ballot issues.³ The same is true of WSLC today. As discussed below, the WSLC’s mission and activities continue to be centered on the fostering of inter-union communication and

¹ See <http://www.pdc.wa.gov/archive/commissionmeetings/meetingshearings/pdfs/2004/05067.Attach.pdf>.

² See <http://www.pdc.wa.gov/archive/commissionmeetings/meetingshearings/pdfs/2004/05067.ROI.pdf>

³ See <http://www.pdc.wa.gov/archive/commissionmeetings/meetingshearings/pdfs/2004/05067.Rec.pdf>

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efforts and the advancement of worker's rights. Electoral political activity is not one of WSLC's primary purposes.

As was previously noted by the PDC's staff in its October 14, 2004, recommendation to the Commission, WSLC's goals are "to bring together all unions and act harmoniously in matters affecting the unions and their members."⁴ Every year during the time period covered by the Complaint, WSLC's Form 990 filed with the Internal Revenue Service, signed under penalty of perjury, has asserted that that WSLC's mission is "[t]o protect and strengthen the rights and conditions of working people and their families." As set forth in Article II of the WSLC Constitution, WSLC's goals and stated purposes continue to be the following:

1. Establish better relations among local unions in the State of Washington;
2. Encourage harmonious action in matters affecting the welfare of our labor movement;
3. To propose, support, and promote legislation favorable to and to oppose legislation detrimental to the interest of workers and organized labor;
4. Promote and distribute labor literature and aid and encourage a more complete labor press;
5. Promote and agitate for the union label, shop card, and services;
6. Better prepare ourselves to combat the enemies of organized labor;
7. Assist local unions in organization and contract negotiations, whenever asked, and to have information and statistics available for all affiliated bodies to aid them in their problems;
8. To encourage workers to register and vote, to exercise their full rights and responsibilities of citizenship, and to perform their rightful part in the political life of the local, state and national communities;
9. To encourage and assist in the formation of local central bodies within the state;
10. Bring into affiliation with the Washington State Labor Council all who are eligible, to the end that the Council shall become a powerful force to speak and act in defense and promotion of the whole body of laboring people of our state; and
11. Give recognition to the principle that both craft and industrial unions are appropriate, equal and necessary as methods of union organization.

See Attachment A, enclosed herewith, at pages 1-2. Electoral political activity is at most just slightly implied in one of the eleven means by which WSLC seeks the "more effective organization of working men and women." *Id.*, page 1 (Preamble).⁵

⁴ <http://www.pdc.wa.gov/archive/commissionmeetings/meetingshearings/pdfs/2004/05067.Memo.pdf>, p. 5.

⁵ Which is to say, that stated purpose number 3, above ("To propose, support, and promote legislation favorable to and to oppose legislation detrimental to the interest of workers and organized labor") at *most* merely implies that there might be circumstances where WSLC would support or oppose candidates or ballot propositions; it certainly does not state this outright, and the language in fact is far more suggestive

As was explained in detail in *Evergreen Freedom Found. v. Washington Educ. Ass'n*, 111 Wn. App. 586, 600 (2002) (“*WEA*”), “if electoral political activity is merely one means the organization uses to achieve its legitimate broad nonpolitical goals, electoral political activity cannot be said to be one of the organization’s primary purposes,” and the organization is therefore not considered a political committee. Because that remains the case here, precisely as it was in 2004, this allegation against WSLC is without merit.

We recognize that, as stated in *WEA*, an organization’s stated goals are not necessarily dispositive of the issue of whether electoral political activity is one of its primary political purposes. An organization could, potentially, “merely restate its primary political purpose in broad nonpolitical terms.” *WEA*, 111 Wn. App. at 600. However, there is absolutely no evidence that this exception applies to WSLC. No one even slightly familiar with the work done by WSLC can doubt that its stated goals, set forth above, are its true goals, and that electoral political activity is just one of the many means by which WSLC seeks to accomplish its goals. *WEA* is therefore dispositive on this issue.

The Court of Appeals decision in *Utter v. Bldg. Indus. Ass’n of Washington*, 176 Wn. App. 646, 667-669 (2013), reversed on other grounds, 179 Wn.2d 1021 (2014), is fully consistent with this conclusion. In determining that the plaintiffs in that case had established a question of material fact regarding whether BIAW had the support of a candidate as one of its primary political purposes during the 2007-2008 campaign season, the Court looked at the minutes of BIAW Board of Director meetings, letters and speeches from BIAW’s president, BIAW’s newsletter, and so on and so forth, all of which communications boiled down to statements by authorized BIAW representatives that (as noted in the minutes) “BIAW’s number one priority this campaign season would be to help Rossi get elected.” In contrast, there is no non-financial evidence from which it could be inferred that electoral political activity is one of the primary purposes of the WSLC.

Not only has FF not identified any statements made by or on behalf of WSLC similar to those made by BIAW representatives in the above-referenced matter, its efforts to infer that WSLC had electoral political activity as one of its primary goals is wholly without merit. According to its website, which reflects the reality of WSLC’s structure, WSLC has nine major programs, also referred to as “core programs,” see <http://www.wslc.org/who-we-are/>, which support its core mission of “improving the working conditions and living standards of Washington’s working families”:

1. Legislative Advocacy
2. Political Action

of an intent to engage in lobbying than it is of an intent to engage in the type of electoral political activity that is relevant to RCW 42.17A.005(37).

3. Communications
4. Organizing Support
5. College/K-12 Apprenticeship
6. Dislocated Worker Assistance
7. Project Help
8. Education
9. Research

See <http://www.wslc.org/services/>.

It is clear from this list of services, too, that WSLC electoral political activities are only a small portion of the work that WSLC performs for its members. Only one of these programs is tied in any way to electoral political activity. The remaining eight programs are designed to provide assistance to union members seeking help with organizing, publicizing events, job retraining, worker's compensation claims, general education on worker's rights, and contract and economic research for the negotiation of contracts, as well as lobbying for legislation. As the PDC recognized in 2004, most of the WSLC programs and services are unrelated to political activities of any sort.⁶

In 2004, the PDC quoted WSLC's counsel as stating that WSLC "is a labor organization that participated in the political process as one of the many ways that it advances its stated goals and missions," and noted that WSLC "would continue to pursue its goals and missions regardless of the outcome of an election."⁷ *Id.* The same is true today. The diversity of WSLC's programs and the indisputable evidence make clear that that WSLC uses means other than electoral political activity to achieve its stated goals, that WSLC's actions further its stated goals and mission, that it would continue to pursue its goals and missions regardless of the outcome of any election, and that it would continue to be in existence even if it were not engaged in the political process, as was the case during the 2004 investigation. *Cf. WEA*, 111 Wn. App. at 600. For the same reasons found persuasive in 2004, the PDC should reject this allegation.

The various documents provided to the PDC in support of the Complaint in no way suggest that a different conclusion should be reached. Most of those items are either entirely irrelevant, such as Exhibit 4 (which relates solely to legislative lobbying and WSLC's 2015 Convention, neither of which involve support of or opposition to

⁶ <http://www.pdc.wa.gov/archive/commissionmeetings/meetingshearings/pdfs/2004/05067.Memo.pdf>, p. 4.

⁷ <http://www.pdc.wa.gov/archive/commissionmeetings/meetingshearings/pdfs/2004/05067.Memo.pdf>, pp. 4-5.

candidates or ballot measures), or merely illustrate the types of work that WSLC's political action program concededly *does* engage in, such as Exhibits 5-7 and 15 (which reflects the fact that WSLC at times compiles and opines on the voting record of state legislators and, upon occasion, endorses candidates and initiatives).

Not only do none of the documents presented by FF suggest that electoral political activity is a primary purpose of WSLC, many of these documents prove just the opposite. Exhibits 8 through 14, for example, identify the 35 resolutions that were passed by the delegates to WSLC's 2015 Convention. Of these, 32 are either wholly unrelated to matters that are the subject of state-wide electoral political activity (e.g., Resolution 3, on organizing; Resolution 12, on "race and the labor movement"; and Resolutions 15 and 20, directed to federal lawmakers), or involve WSLC taking a position on pending or potential legislation, which does *not* involve either candidate support or support of or opposition to any ballot measure.

Resolution 2, for example, specifically cited by FF as evidence of the type of WSLC political activity that could confer "political committee" status upon it, clearly calls only for supporting "legislative action" to alter I-200 – a call that is unrelated to any ballot measure campaign. Resolution 13, also a focus of FF's attention, calls merely for creation of a "study group" to "examine the possibility of sponsoring" an initiative of the people, something that *also* is not related to advocacy for any ballot proposition.⁸ Resolution 15 involves a federal political issue, the Trans-Pacific Partnership, which is not a ballot proposition of any sort, much less a ballot proposition falling within the definition set forth in RCW 42.17A.005(4).

Only three of the resolutions, approximately eight percent, even *arguably* relate to support of a ballot measure (Resolutions 1, 9, and 33⁹), and even those do not commit organizational funds or resources to that effort.¹⁰ The inevitable conclusion is that far from electoral political activity (as defined by RCW 42.17A.005(37)) being central to WSLC's mission, it is at best peripheral, even in the context of what is at most no more than a general statement of preferences and goals being expressed by the delegates to WSLC's Convention.

Finally, the proportion of WSLC's expenditures devoted to electoral political activity does not provide a separate basis for concluding that such activity is one of the primary purposes of WSLC. While WSLC has not yet had a chance to prepare a detailed accounting of its expenditures during calendar years 2011 through 2015, *far* less was spent on activities that supported or opposed candidates or ballot measures than was spent on other functions and services. Even by FF's own account, the amount of money

⁸ See, e.g., RCW 42.17A.005(4) (defining ballot proposition as a measure that has been filed with the appropriate election officer before its circulation for signatures).

⁹ Contrary to FF's assertion, on page 4 of the Complaint, Resolution 18, which references supporting legislation "and other activities" to make postage for return ballots prepaid cannot reasonably be seen as a resolution intended to express specific support for or opposition to any particular candidates or ballot propositions.

¹⁰ The reference in Resolution 18 to WSLC resolving to supporting candidates "that support a fair revenue solution," is so obviously *de minimis* as to not be worth further discussion here.

spent by WSLC over the five year period covered by its Complaint, 2010-2015, is trivial compared to WSLC's expenditures. According to WSLC's IRS Form 990 filings, WSLC had total expenses during that time period as follows:

April 1, 2010 through March 31, 2011: \$3,498,515
April 1, 2011 through March 31, 2012: \$3,999,105
April 1, 2012 through March 31, 2013: \$3,331,937
April 1, 2013 through March 31, 2014: \$4,242,597
April 1, 2014 through March 31, 2015: \$3,597,352

See Attachments B through F, enclosed herewith.

Looking just at the monetary figures alleged by FF, it is clear that at no point during the period of time covered by the Complaint did the amount of money being spent by WSLC on electoral political activity, e.g., WSLC's contributions to ballot measure committees and to its own political action committees, DIME PAC and WSLC PPP, amount to even **two percent** of WSLC's overall expenditures.¹¹

Thus, to the extent that it matters whether or not a "majority" of WSLC's expenditure activity was focused on electoral political activity, which is considered an important part of the balancing of factors recommended by the Court in *WEA*, the facts of this case militate strongly against a finding adverse to WSLC on this issue.¹²

¹¹ FF asserts that from 2010 through 2015, WSLC has donated a total of \$27,224 to DIME PAC, \$111,876.92 to the PPP Committee, \$119,650 to other political committees or candidates, and \$145,000 to support initiatives. Complaint, page 5. This is a total of \$403,750, which is only slightly more than 2% of the \$18,669,406 spent by WSLC from April 1, 2010, through March 31, 2015 – but that that figure of \$18,669,406 does not include WSLC's expenditures from January 1, 2010, through March 31, 2010, or from April 1, 2015, to the end of the current year, which (based on the average monthly expenditures made by WSLC during the five years covered by the last five IRS Form 990 filings referenced above), would approximate an additional \$3,733,881 (i.e., an additional twelve months' worth of expenses). Thus, even if WSLC *had* spent \$403,750 on electoral political activities during the six years put at issue by FF, that amount of money would constitute only **1.75%** of the total amount of money spent by WSLC during that same time period, \$23,099,128.

Moreover, the \$403,750 figure number is itself erroneously high, because FF apparently includes in it contributions allegedly made by WSLC to candidates for public office. Wherever such contributions are listed on a C-3 form, however (*see*, for example, the December 9, 2010, C-3 filed by the People for Chris Gregoire Committee, which shows a \$1000 contribution from WSLC to that committee), that is merely a scrivener's error on the part of that candidate's committee. For a variety of legal and other reasons, WSLC does not and never has donated money to candidates or candidate committees; all such contributions are made by PPP (and are properly reported by the PPP as such, regardless of whether the recipient has properly reported receipt). The value of such donations is therefore already included in the amount of money contributed by WSLC to PPP, as alleged by FF, and cannot be double-counted as yet a further expenditure of funds made by WSLC.

¹² FF's final assertion on this point, that "upon information and belief," WSLC employees "spend significant time supporting and/or opposing candidates and/or ballot propositions while being compensated by WSLC," Complaint, page 5, is factually unsupported and, at least in the context of support or opposition to candidates, demonstrably wrong. As review of the C-4 Forms filed by PPP and DIME PAC reveals (at least some of which are included in FF's Exhibit 22), these committees regularly reimbursed WSLC for the cost of staff time devoted to operation of those committees, reporting it properly on Schedule B. This documentation establishes beyond any reasonable dispute that any time spent by WSLC employees

Tony Perkins
December 14, 2015
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Because no other evidence exists to support this portion of FF's Complaint, it should be dismissed as meritless.

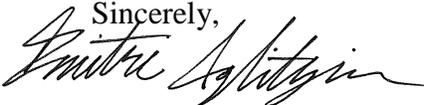
WSLC may have violated RCW 42.17A.630

Subject to further investigation and review by the undersigned, it does appear that WSLC has failed, in its role as a lobbyist employer, to report each and every contribution it has made to a political committee (including PPP, DIME PAC, and non-affiliated political committees) on a monthly basis on either an L2 or L3c form. While there is no evidence that any WSLC staff member performed "[m]ore than incidental PAC-related functions" (see the PDC's Political Committees Campaign Disclosure Instructions (June 2014), at p. 59) without WSLC being paid for that time by the appropriate political committee,¹³ there does appear to be a basis for the PDC, and the Office of the Attorney General, to conclude that WSLC has improperly failed to comply with the requirements of RCW 42.17A.630 by failing to properly report certain of its monetary contributions to political committees. We look forward to discussing this issue further with the PDC and the Office of the Attorney General, as appropriate.

Conclusion

For the foregoing reasons, WSLC is not an unregistered political committee and has not violated any of the reporting requirements that otherwise would have been applicable to it. However, it appears to have violated RCW 42.17A.630.

Please do not hesitate to contact us if you have any questions, or if we can be of further assistance.

Sincerely,


Dmitri Iglitzin
Marie Duarte
Counsel for WSLC

cc: Linda A. Dalton, Sr. Asst. Atty. General
David Horn, Chief Deputy Atty. General (w/out encl.)
Chad Standifer, Asst. Atty. General (w/out encl.)
Phil Stutzman, Public Disclosure Commission (w/out encl.)
Lynne Dodson, WSLC (w/out encl.)

supporting or opposing candidates was paid for by one or the other or both of these two political committees, and thus cannot be "double-counted" as an additional, unspecified expenditure of funds by WSLC, as FF seeks to do.

¹³ See note 12, *supra*.

Attachment A

WSLC Constitution

(as amended August 2012 & approved November 20, 2012)

PREAMBLE

The establishment of this State Central Body as a subordinate unit of the American Federation of Labor and Congress of Industrial Organizations is an expression of the desire of the unions in Washington state to participate fully in the achievement of the objectives of the AFL-CIO as it seeks to fulfill the hopes and aspirations of the working people of all America.

We seek the fulfillment of these hopes and aspirations through democratic processes within the framework of our constitutional government and consistent with our institutions and traditions.

At the collective bargaining table, in the community, in the exercise of the rights and responsibilities of citizenship, we shall responsibly serve the interests of all the American people.

We pledge ourselves to the more effective organization of working men and women; to the securing to them of full recognition and enjoyment of the rights to which they are justly entitled; to the achievement of ever higher standards of living and working conditions; to the attainment of security for all the people; to the enjoyment of the leisure which their skills make possible; and to the strengthening and extension of our way of life and the fundamental freedoms which are the basis of our democratic society.

We shall combat resolutely the forces that seek to undermine the democratic institutions of our nation and to enslave the human soul. We shall strive always to win full respect for the dignity of the human individual whom our unions serve.

Grateful for the fine traditions of our past, confident of meeting the challenge of the future, we proclaim this constitution.

ARTICLE I

Name and Affiliation

This body shall be known as the Washington State Labor Council, AFL-CIO. It shall at all times maintain affiliation with the American Federation of Labor and Congress of Industrial Organizations in accordance with the laws of that organization. As a chartered organization of the AFL-CIO, this body shall conform its activities with national affairs to the policies of the AFL-CIO.

ARTICLE II

Purposes and Declaration of Principle

The purposes of the Washington State Labor Council, AFL-CIO, are to:

- Establish better relations among local unions in the State of Washington;
- Encourage harmonious action in matters affecting the welfare of our labor movement;

- To propose, support, and promote legislation favorable to and to oppose legislation detrimental to the interest of workers and organized labor.
- Promote and distribute labor literature and aid and encourage a more complete labor press;
- Promote and agitate for the union label, shop card, and services;
- Better prepare ourselves to combat the enemies of organized labor;
- Assist local unions in organization and contract negotiations, whenever asked, and to have information and statistics available for all affiliated bodies to aid them in their problems;
- To encourage workers to register and vote, to exercise their full rights and responsibilities of citizenship, and to perform their rightful part in the political life of the local, state and national communities;
- To encourage and assist in the formation of local central bodies within the state;
- Bring into affiliation with the Washington State Labor Council all who are eligible, to the end that the Council shall become a powerful force to speak and act in defense and promotion of the whole body of laboring people of our state;
- Give recognition to the principle that both craft and industrial unions are appropriate, equal and necessary as methods of union organization.

Declaration of Principle

“The Concern of One is the Concern of All.”

ARTICLE III

Affiliates

Sec. 1. The following organizations, chartered or having membership working in Washington State shall be eligible to affiliate with this organization:

- (a) Local unions chartered by national or international unions affiliated with the AFL-CIO.
- (b) Local unions and organizing committees chartered by the AFL-CIO.
- (c) Central labor councils chartered by the AFL-CIO.
- (d) Department councils chartered by the departments of the AFL-CIO.
- (e) Joint boards, district councils, state associations and similar subordinate organizations within the geographical limits of the state duly chartered by an affiliate of the AFL-CIO.
- (f) The AFL-CIO State Retiree Council, affiliate retiree organizations of the State Retiree Council, and union retiree groups.
- (g) Statewide young labor leader organizations and union-affiliated young leader groups.
- (h) State chapters of AFL-CIO constituency groups, as defined in the Rules Governing AFL-CIO State Central Bodies that are chartered by a national AFL-CIO constituency group: If a constituency group has one or more chapters in the state, but no statewide chapter, a local chapter designated by the national constituency group may be admitted as an affiliate.

- (i) A state chapter, or local chapter if no state chapter exists, of an AFL-CIO constituency group shall be entitled to one (1) delegate and one (1) vote. No AFL-CIO constituency group or its delegate may be present for or have a voice or vote in any meeting or proceeding concerning the endorsement of a political candidate. However, a constituency group or its delegate may be present and have voice but no vote in discussions regarding ballot initiatives.

Sec. 2. Any union that has not been previously affiliated may become affiliated by paying one month's full per capita tax for the month in which it makes application. Any central labor council or subordinate council that has not been previously affiliated may become affiliated by paying the annual fee as determined in Article XI, Sec. 1(c). The State Retiree Council affiliated with the AFL-CIO shall be entitled to affiliate by paying the annual fee as determined in Article XI, Sec. 1(b).

ARTICLE IV Convention

Sec. 1. The Washington State Labor Council shall hold a constitutional convention on or near the middle of July in each even-numbered year at such place as the Executive Board may determine. If any unforeseen emergency arises, the date and place of the convention may be changed by a two-thirds majority of the Executive Board. Additional COPE conventions may be convened at such time as determined appropriate by the Executive Board to consider COPE endorsements for the primary or general elections.

Sec. 2. The Secretary Treasurer shall notify all affiliated organizations at least ninety (90) days prior to the date for the convention of the date and place of the convention, the number of delegates the organization is entitled to and the convention voting strength of the organization. Any affiliated organization which protests the number of delegates to which it is entitled or its voting strength must notify the Secretary Treasurer of the protest at least sixty (60) days prior to the convention. If the protest cannot be adjusted through an informal conference, the Secretary Treasurer shall notify the President who shall appoint a committee of three (3) Vice Presidents who shall hold a hearing and render a decision prior to the convention.

Sec. 3. Special conventions for stated limited purposes may be convened by the convention or by written request of twenty-five percent (25%) of the organizations affiliated with the Washington State Labor Council or a two-thirds majority of the Executive Board. All affiliated organizations shall be given sixty (60) days' notice of a special convention and such notice shall include the subject or subjects to be considered.

Sec. 4. In each odd-numbered year, the Washington State Labor Council shall hold a convention on or near the middle of July. No constitutional changes shall be enacted at this convention.

Sec. 5. The President and the Secretary Treasurer shall prepare a preliminary roll of delegates, where no protests have been filed, from credentials in their possession and such delegates shall have the power to transact the business of the convention until the report of the committee on credentials is received and adopted.

Sec. 6. (a) Approximately ninety (90) calendar days in advance of the conventions required by this article and sixty (60) calendar days in advance of special conventions, affiliated organizations shall be furnished with blank credentials consisting of a master credential on which all delegates and alternates are to be listed and individual credentials for each delegate and alternate. The master credential shall be returned to the headquarters of the Washington State Labor Council at least thirty (30) days prior to the convention. The individual

made. At the discretion of the Washington State Labor Council Executive Board, grants may be made in a series of payments. All requests for funds shall be in compliance with the constitution and laws of the section or sections involved the Washington State Labor Council and the AFL-CIO.

Sec. 5. Should financial aid be approved by the trustees of a section and the Executive Board of the Washington State Labor Council, the affiliated organization receiving same shall give a complete itemized statement of expenditures monthly to the officers of the section and the Executive Board of the Washington State Labor Council. Upon failure to file such report, financial aid shall be discontinued until the report has been filed.

Sec. 6. In the event of a vacancy in any section office, such vacancy may be filled by the remaining officers.

Sec. 7. Any by-laws adopted by the sections shall be in conformity with the Constitution of the Washington State Labor Council, AFL-CIO.

ARTICLE X Charges and Hearings

Sec. 1. Any affiliated local union by vote of its membership shall have the right to file charges against (a) any officer of the Washington State Labor Council for violating the constitution or rules of the AFL-CIO or the Washington State Labor Council or for conduct unbecoming an officer, misappropriation of funds, malfeasance in office or neglect of duty, or (b) against any affiliated organization for engaging in conduct or a course of action hostile or contrary to the best interests of the Washington State Labor Council or contrary to this constitution.

Sec. 2. All charges shall be in writing, specifying the particular act or acts charged; shall be signed by at least two officers of the charging local union; and shall be filed with the President or Secretary Treasurer of the council or with any other officer of the council, if both the President and Secretary Treasurer are charged.

Sec. 3. Upon receipt of properly filed charges, the officers receiving the charges shall present them to a special meeting of the Executive Board, which shall be convened within one (1) month of receiving the charges. The Executive Board shall determine by majority vote whether or not the charges merit a hearing; provided, that the officer or officers named in the charge shall not vote.

Sec. 4. The Executive Board may take appropriate disciplinary action, including the suspension or removal of any officer or the suspension or expulsion of any affiliated organization found guilty of the charges by a two-thirds vote, following a hearing, of which the accused shall have been notified and furnished with a copy of the charges not less than twenty (20) days in advance of the hearing. Both the accused and the charging party shall be accorded full opportunity to be heard and to present evidence.

Sec. 5. The decision of the Executive Board under Section 3 or 4 shall be final and binding unless appealed to the AFL-CIO as provided in Rule 27 of the AFL-CIO Rules Governing State Central Bodies. The decision of the Executive Board shall remain in effect during the appeal unless reversed, modified, or temporarily stayed by the AFL-CIO.

ARTICLE XI Per Capita Taxes and Fees

Sec. 1. The revenue of the Washington State Labor Council shall be derived as follows:

- (a) Effective January 1, 2005, a per capita tax of eighty-five (85) cents per member per month payable monthly from all local unions on full membership within the jurisdiction of the Washington State Labor Council, AFL-CIO. Per capita tax shall be due on the first of each month.
- (b) Other affiliated organizations shall pay a fee of fifty (50) dollars annually, payable in advance.

Sec. 2. Local unions affiliated with the Washington State Labor Council shall pay per capita tax on their full membership as paid to their international union or shall be automatically suspended from membership; provided, where it can be shown by a local union that payment of full per capita tax will result in unnecessary hardship, the local union may petition the Executive Board of the Washington State Labor Council through the Secretary Treasurer for exoneration from per capita tax. The Secretary Treasurer may require evidence of the local union's inability to pay. The Executive Board of the Washington State Labor Council may grant relief in an amount sufficient to keep the local union functioning in a proper manner.

Sec. 3. Any affiliated organization not paying its full per capita tax or fees by the twenty-fifth (25) day of the following month shall be notified of that fact by the secretary- treasurer. If payment has not been made three (3) months after notification, the delinquent organization shall be suspended from membership.

Sec. 4. Any affiliated organization suspended for non-payment of full per capita tax may be reinstated under conditions determined by the Executive Board.

Sec. 5. All revenue from per capita tax and affiliation fees shall be credited to the general fund except as provided herein:

- (a) Three (3) per cent of the revenue from per capita tax and affiliation fees paid by local unions shall be credited to the Organization and Defense Fund to be used for organization and defense work. Beginning September 1, 2012, the three percent (3%) allocation will only be separated from normal per capita income when the funds for the Trade Sections fall below \$100,000 and will be distributed up to the ratio each section bears to the total membership of the Washington State Labor Council, AFL-CIO. In the event a Section's monies become depleted prior to the total balance dropping below \$100,000, the Executive Board is empowered to backfill the deficiency by a majority vote. Twenty-five (25) per cent of the funds allocated to the various sections shall be set aside to defray the costs of operating the sections. Monies from the organization and defense funds shall be disbursed by the Secretary Treasurer of the Washington State Labor Council only in compliance with Section 3, Article IX, of this Constitution. An annual report of the monies disbursed for the operation of the sections shall be submitted to the Secretary Treasurer not later than July 1, covering the period of the council's fiscal year, for inclusion in the secretary- treasurer's report to the convention.
- (b) Two (2) per cent of the revenue from per capita tax and affiliation fees paid by local unions shall be credited to the label promotion and education fund. One-half of the receipts of this fund shall be credited or remitted to the statewide organization charged with conducting or coordinating statewide activities in support of the union label, shop card, and union services. The balance of the fund shall be used in union educational programs, and the funding of scholarships, fellowships, and internships.

Sec. 6. All other funds received by the council shall be accounted for by the Secretary Treasurer as directed by the Executive Board or as required by law.

ARTICLE XII
Financial Practices and Audits

Sec. 1. All funds received by the Washington State Labor Council shall be immediately deposited in federally insured financial institutions. No money shall be paid out except by check bearing the signature of the President and Secretary Treasurer.

Sec. 2. The Executive Board shall appoint an independent certified public accountant to audit the books of the council at least annually and perform such other duties as the board deems necessary. The independent certified public accountant shall report to the Executive Board. The board shall require an audit of the council books in the event of a change or vacancy in any full-time council office.

Sec. 3. Officers and staff shall be reimbursed for necessary and legitimate expenses, including loss of wages incurred in the performance of authorized activities for the council; however, other authorized persons may be reimbursed for expenses in accordance with guidelines established by the Executive Board. Reimbursement for travel when transportation is not furnished by the council shall be at the rate established for business automobile use by the Internal Revenue Service or actual transportation costs when commercial carriers are used and when no automobile is furnished by the council.

Sec. 4. The President and Secretary Treasurer shall be covered by a fidelity bond in an amount to be determined by the Executive Board or as may be required by the Secretary Treasurer of the AFL-CIO. The premium of such bond shall be paid by the Washington State Labor Council.

Sec. 5. Election board members shall receive twenty-five dollars (\$25.00), in addition to reimbursement for lost wages and necessary expenses, for each day spent in the performance of official duties.

Sec. 6. The President shall submit an annual budget to the Executive Board setting forth anticipated receipts and expenditures. The Executive Board shall adopt the budget before the beginning of the fiscal year after adopting such changes as they deem necessary. Major deviations from the budget shall be reviewed with the Executive Board by the Secretary Treasurer. No financial obligations will be incurred on behalf of the council without the consent of the Executive Board.

Sec. 7. Officers shall at the expiration of their terms of office deliver to their successors all monies, securities and papers of the council which may be under their control.

Sec. 8. All books, papers, and financial records of the council shall at all times be open for inspection by the Executive Board and duly authorized representatives of any affiliated organization.

ARTICLE XIII
Committees

Sec. 1. In addition to the committees established by Article IV, Section 21, additional special committees and standing committees may be established as needed and shall be appointed by the President unless otherwise directed by the convention or the Executive Board.

Sec. 2. All committees shall report to the Executive Board except that standing committees of more than two years' duration shall also report to the convention. The Executive Board shall adopt rules governing all committees except those established by Article IV, Section 21.

PDC Case 1543:

Expenditures by WSLC for Electoral Political Activity, December 2010 - December 2015

	A	B	C	D	E	F
1	Name	Contributor	Date	Amount	P/G	Description
2	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2010-12-31	280	N	SALARY
3	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2010-12-31	80	N	POSTAGE
4	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2010-12-31	60	N	PRINTING
5	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2010-12-31	50	N	LEGAL
6	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2010-12-31	40	N	SUPPLIES
7	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-01-31	280	N	SALARY
8	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-01-31	80	N	POSTAGE
9	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-01-31	60	N	PRINTING
10	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-01-31	50	N	LEGAL
11	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-01-31	40	N	SUPPLIES
12	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-02-28	280	N	SALARY
13	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-02-28	80	N	POSTAGE
14	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-02-28	60	N	PRINTING
15	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-02-28	50	N	LEGAL
16	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL AFL CIO	2011-02-28	40	N	SUPPLIES
17	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-03-30	280	N	SALARY
18	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-03-30	80	N	POSTAGE
19	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-03-30	60	N	PRINTING
20	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-03-30	50	N	LEGAL
21	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-03-30	40	N	SUPPLIES
22	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-04-30	280	N	SALARY
23	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-04-30	80	N	POSTAGE
24	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-04-30	60	N	PRINTING
25	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-04-30	50	N	LEGAL
26	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-04-30	40	N	SUPPLIES
27	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-05-31	280	N	SALARY
28	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-05-31	80	N	POSTAGE
29	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-05-31	60	N	PRINTING
30	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-05-31	50	N	LEGAL
31	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-05-31	40	N	SUPPLIES
32	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-06-20	10000	N	
33	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-06-30	280	N	SALARY
34	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-06-30	80	N	POSTAGE
35	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-06-30	60	N	PRINTING
36	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-06-30	50	N	LEGAL
37	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-06-30	40	N	SUPPLIES
38	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-07-31	280	N	SALARY/ BENEFITS
39	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-07-31	80	N	POSTAGE
40	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-07-31	60	N	PRINTING
41	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-07-31	50	N	LEGAL/ACCOUNTING
42	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-07-31	40	N	SUPPLIES

PDC Case 1543:

Expenditures by WSLC for Electoral Political Activity, December 2010 - December 2015

	A	B	C	D	E	F
1	Name	Contributor	Date	Amount	P/G	Description
43	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-08-31	280	N	SALARY/BENEFITS
44	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-08-31	80	N	POSTAGE
45	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-08-31	60	N	PRINTING
46	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-08-31	50	N	LEGAL/ACCT.
47	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-08-31	40	N	SUPPLIES
48	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-09-26	1440	N	
49	PROTECT OUR COMMUNITIES	WA ST LABOR COUNCIL AFL CIO	2011-09-30	15000	N	
50	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-09-30	280	N	SALARY/BENEFITS
51	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-09-30	80	N	POSTAGE
52	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-09-30	60	N	PRINTING
53	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-09-30	50	N	LEGAL/ACCT
54	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-09-30	40	N	SUPPLIES
55	KEEP WA ROLLING	WA ST LABOR COUNCIL	2011-10-07	15000	N	
56	WA ST DEMO CENT COMM NON EXEMPT	WA ST LABOR COUNCIL AFL CIO	2011-10-17	600	N	
57	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-10-31	280	N	SALARY/ BENEFITS
58	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-10-31	80	N	POSTAGE
59	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-10-31	60	N	PRINTING
60	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-10-31	50	N	LEGAL/ ACCT.
61	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-10-31	40	N	SUPPLIES
62	DON'T INVEST IN MORE EXCUSES PAC	WA ST LABOR COUNCIL	2011-11-16	15	N	
63	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2011-11-23	375	N	
64	DON'T INVEST IN MORE EXCUSES PAC	WA ST LABOR COUNCIL	2011-12-06	100	N	
65	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2012-02-29	487.5	N	
66	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2012-05-25	10000	N	
67	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2012-06-11	5000	N	
68	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2012-07-12	5000	N	
69	WA ST DEMO CENT COMM NON EXEMPT	WA ST LABOR COUNCIL AFL CIO	2012-08-05	4500	N	
70	WA ST DEMO CENT COMM EXEMPT	WA ST LABOR COUNCIL AFL CIO	2012-08-06	500	N	
71	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WA ST LABOR COUNCIL	2012-08-22	310	N	
72	1ST DIST DEMO NON EXEMPT	WA ST LABOR COUNCIL	2012-09-08	2000	N	
73	WA ST LABOR COUNCIL AFL CIO PPP COMM	WA ST LABOR COUNCIL	2012-09-13	5000	N	
74	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2012-10-03	2100	N	
75	NO ON I-1185 COMM	WA STATE LABOR COUNCIL	2012-10-04	5000	N	
76	WA UNITED FOR MARRIAGE	WASHINGTON STATE LABOR COUNCIL AFL-CIO	2012-10-04	5000	N	
77	PEOPLE FOR OUR PUBLIC SCHOOLS	WASHINGTON STATE LABOR COUNCIL AFL-CIO	2012-10-09	10000	N	
78	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2012-10-12	500	N	
79	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2012-10-15	825	N	
80	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2012-10-25	500	N	
81	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2012-10-29	200	N	
82	WA ST DEMO CENT COMM EXEMPT	WA STATE LABOR COUNCIL AFL-CIO	2013-01-29	500	N	
83	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2013-02-06	412.5	N	

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Expenditures by WSLC for Electoral Political Activity, December 2010 - December 2015

	A	B	C	D	E	F
1	Name	Contributor	Date	Amount	P/G	Description
84	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2013-02-27	30	N	
85	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2013-03-08	200	N	
86	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2013-03-25	0	N	
87	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2013-06-28	15	N	
88	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2013-07-10	10000	N	
89	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2013-08-07	0	N	
90	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2013-08-09	140	N	
91	YES! FOR SEATAC	WASHINGTON STATE LABOR COUNCIL AFL-CIO	2013-09-10	5000	N	
92	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2013-09-27	65	N	
93	CIT FOR HONEST GOVT PAC	WA STATE LABOR COUNCIL	2013-10-16	4950	N	
94	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2013-11-25	5000	N	
95	WA ST DEMO CENT COMM NON EXEMPT	WA STATE LABOR COUNCIL AFL-CIO	2013-12-02	500	N	
96	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2014-01-29	525	N	
97	WA ST DEMO CENT COMM EXEMPT	WA STATE LABOR COUNCIL AFL-CIO	2014-02-14	500	N	
98	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-07-15	87.5	N	PHONEBANK
99	PRINCIPLED LEADERSHIP IN THE 30TH DIST	WASHINGTON STATE LABOR COUNCIL	2014-07-15	138.11	N	PHONEBANK
100	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-07-17	87.5	N	PHONEBANK
101	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-07-17	122.42	N	PHONEBANK
102	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-07-17	298.14	N	PHONEBANK
103	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-07-19	234.5	N	PHONEBANK
104	WORKING TOGETHER FOR THE 17TH PAC	WASHINGTON STATE LABOR COUNCIL	2014-07-19	454.2	N	PHONEBANK
105	PRINCIPLED LEADERSHIP IN THE 30TH DIST	WASHINGTON STATE LABOR COUNCIL	2014-07-22	1.42	N	PHONEBANK
106	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-07-24	122.74	N	PHONEBANK
107	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-07-29	87.5	N	PHONEBANK
108	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-07-29	89.25	N	PHONEBANK
109	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-07-29	311.69	N	PHONEBANK
110	LOCAL JOBS FOR SPOKANE	WASHINGTON STATE LABOR COUNCIL	2014-07-31	81	N	PHONEBANK
111	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-07-31	53.29	N	PHONEBANK
112	LOCAL JOBS FOR SPOKANE	WASHINGTON STATE LABOR COUNCIL	2014-08-02	499.53	N	CANVASSING
113	WORKING TOGETHER FOR THE 44TH HOUSE	WASHINGTON STATE LABOR COUNCIL	2014-08-02	320.25	N	PHONEBANK
114	PRINCIPLED LEADERSHIP IN THE 30TH DIST	WASHINGTON STATE LABOR COUNCIL	2014-09-02	344.84	N	PHONEBANK: STAFF TIME
115	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-09-02	612.6	N	PHONEBANK
116	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-02	20	N	USE OF PHONE BANK
117	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-09-09	330.8	N	PHONEBANK
118	SENSIBLE LEADERSHIP FOR WHATCOM	WASHINGTON STATE LABOR COUNCIL	2014-09-09	30	N	PHONEBANK
119	SNOHOMISH CIT FOR GOOD GOVT	WASHINGTON STATE LABOR COUNCIL	2014-09-09	30	N	PHONEBANK
120	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-09	20	N	USE OF PHONE BANK
121	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-11	304.84	N	STAFF TIME: PHONEBANK
122	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-11	20	N	USE OF PHONE BANK
123	LOCAL JOBS FOR SPOKANE	WASHINGTON STATE LABOR COUNCIL	2014-09-16	295.14	N	PHONEBANK
124	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-09-16	280.8	N	PHONEBANK

**PDC Case 1543:
Expenditures by WSLC for Electoral Political Activity, December 2010 - December 2015**

	A	B	C	D	E	F
1	Name	Contributor	Date	Amount	P/G	Description
125	SENSIBLE LEADERSHIP FOR WHATCOM	WASHINGTON STATE LABOR COUNCIL	2014-09-16	12.19	N	PHONEBANK
126	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-16	20	N	USE OF PHONE BANK
127	WORKING TOGETHER FOR THE 17TH PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-16	20	N	PHONEBANK
128	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-18	304.84	N	STAFF TIME: PHONEBANK
129	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-09-20	689.71	N	CANVASSING
130	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-23	307	N	STAFF TIME: PHONEBANK
131	SENSIBLE LEADERSHIP FOR WHATCOM	WASHINGTON STATE LABOR COUNCIL	2014-09-23	49.82	N	PHONEBANK
132	LOCAL JOBS FOR SPOKANE	WASHINGTON STATE LABOR COUNCIL	2014-09-24	309.38	N	PHONEBANK
133	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-25	6.25	N	PHONEBANK
134	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-09-25	280.8	N	PHONEBANK
135	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-25	20	N	USE OF PHONE BANK
136	EASTSIDE INTEGRITY PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-27	130.43	N	STAFF TIME: CANVASSING
137	REAL REPRESENTATION IN THE 35TH	WASHINGTON STATE LABOR COUNCIL	2014-09-27	631.4	N	CANVASSING
138	SNOHOMISH CIT FOR GOOD GOVT	WASHINGTON STATE LABOR COUNCIL	2014-09-27	386.1	N	CANVASSING
139	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-27	50	N	USE OF HALL
140	LOCAL JOBS FOR SPOKANE	WASHINGTON STATE LABOR COUNCIL	2014-09-30	192.08	N	PHONEBANK
141	SENSIBLE LEADERSHIP FOR WHATCOM	WASHINGTON STATE LABOR COUNCIL	2014-09-30	20.16	N	PHONEBANK
142	SNOHOMISH CIT FOR GOOD GOVT	WASHINGTON STATE LABOR COUNCIL	2014-09-30	50	N	PHONEBANK
143	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-30	20	N	USE OF PHONE BANK
144	WORKING TOGETHER FOR THE 17TH PAC	WASHINGTON STATE LABOR COUNCIL	2014-09-30	50	N	PHONEBANK
145	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-02	20	N	USE OF PHONE BANK
146	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-07	20	N	USE OF PHONE BANK
147	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-09	20	N	USE OF PHONE BANK
148	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-10-13	389.73	N	PHONEBANK
149	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-10-14	6.25	N	PHONEBANK
150	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-14	20	N	USE OF PHONE BANK
151	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-10-16	6.25	N	PHONEBANK
152	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-16	20	N	USE OF PHONE BANK
153	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-10-21	6.25	N	PHONEBANK
154	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-21	20	N	USE OF PHONE BANK
155	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-10-23	6.25	N	PHONEBANK
156	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-23	20	N	USE OF PHONE BANK
157	28TH DIST CIT FOR REAL DEMOCRACY	WASHINGTON STATE LABOR COUNCIL	2014-10-25	6.25	N	CANVASSING
158	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-25	50	N	USE OF HALL
159	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-28	20	N	USE OF PHONE BANK
160	WA ST LABOR COUNCIL DON'T INVEST IN MORE EXCUSES PAC	WASHINGTON STATE LABOR COUNCIL	2014-10-30	20	N	USE OF PHONE BANK
161	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2015-02-24	2215	N	
162	WA ST DEMO CENT COMM EXEMPT	WA STATE LABOR COUNCIL AFL-CIO	2015-03-09	500	N	
163	WA ST LABOR COUNCIL AFL CIO DIME PAC	WASHINGTON STATE LABOR COUNCIL	2015-07-31	1104	N	
164	WA ST LABOR COUNCIL AFL CIO PPP COMM	WASHINGTON STATE LABOR COUNCIL	2015-07-31	7656.92	N	
165	WA ST LABOR COUNCIL AFL CIO DIME PAC	WASHINGTON STATE LABOR COUNCIL	2015-08-25	5000	N	

PDC Case 1543:

Expenditures by WSLC for Electoral Political Activity, December 2010 - December 2015

	A	B	C	D	E	F
1	Name	Contributor	Date	Amount	P/G	Description
166	WA ST LABOR COUNCIL AFL CIO DIME PAC	WASHINGTON STATE LABOR COUNCIL	2015-09-16	5000	N	
167	WA ST COALITION TO AMEND THE CONSTITUTION	WASHINGTON STATE LABOR COUNCIL AFL-CIO	2015-11-12	500	N	
168		TOTAL WSLC CONTRIBUTIONS IN DB		164355.12		

Return of Organization Exempt From Income Tax
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code
(except black lung benefit trust or private foundation)

OMB No. 1545-0047

2010

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

▶ The organization may have to use a copy of this return to satisfy state reporting requirements.

A For the 2010 calendar year, or tax year beginning 4/01 , 2010, **and ending** 3/31 , 2011

B Check if applicable:
 Address change
 Name change
 Initial return
 Terminated
 Amended return
 Application pending

WASHINGTON STATE LABOR COUNCIL, AFL-CIO
314 FIRST AVENUE WEST
SEATTLE, WA 98119

D Employer identification number 91-0668471

E Telephone number (206) 281-8901

G Gross receipts \$ 3,489,420.

F Name and address of principal officer: LYNNE DODSON
SAME AS C ABOVE

H(a) Is this a group return for affiliates? Yes No
H(b) Are all affiliates included? Yes No
 If 'No,' attach a list. (see instructions)

I Tax-exempt status 501(c)(3) 501(c) (5) (insert no.) 4947(a)(1) or 527

J Website: ▶ WWW.WSLC.ORG **H(c) Group exemption number** ▶ 1338

K Form of organization: Corporation Trust Association Other ▶ **L Year of Formation:** 1957 **M State of legal domicile:** WA

Part I Summary

1 Briefly describe the organization's mission or most significant activities: THE ORGANIZATION'S PRIMARY EXEMPT PURPOSE IS TO PROTECT AND STRENGTHEN THE RIGHTS AND CONDITIONS OF WORKING PEOPLE AND THEIR FAMILIES.

2 Check this box if the organization discontinued its operations or disposed of more than 25% of its net assets.

3 Number of voting members of the governing body (Part VI, line 1a)	3	28
4 Number of independent voting members of the governing body (Part VI, line 1b)	4	26
5 Total number of individuals employed in calendar year 2010 (Part V, line 2a)	5	27
6 Total number of volunteers (estimate if necessary)	6	0
7a Total unrelated business revenue from Part VIII, column (C), line 12	7a	0.
b Net unrelated business taxable income from Form 990-T, line 34	7b	0.

	Prior Year	Current Year
8 Contributions and grants (Part VIII, line 1h)	758,073.	1,226,435.
9 Program service revenue (Part VIII, line 2g)	2,393,538.	2,402,935.
10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)	204.	121.
11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	239,078.	-140,071.
12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	3,390,893.	3,489,420.
13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)	9,956.	17,868.
14 Benefits paid to or for members (Part IX, column (A), line 4)		
15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	2,689,943.	2,598,769.
16a Professional fundraising fees (Part IX, column (A), line 11e)		
b Total fundraising expenses (Part IX, column (D), line 25) ▶		
17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24f)	798,616.	1,382,468.
18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	3,498,515.	3,999,105.
19 Revenue less expenses. Subtract line 18 from line 12	-107,622.	-509,685.

	Beginning of Current Year	End of Year
20 Total assets (Part X, line 16)	1,587,360.	1,252,881.
21 Total liabilities (Part X, line 26)	3,457,294.	3,235,391.
22 Net assets or fund balances. Subtract line 21 from line 20	-1,869,934.	-1,982,510.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature of officer: LYNNE DODSON
Date: SECRETARY-TREASURER

Type or print name and title.

Paid Preparer Use Only

Print/Type preparer's name: CHRIS MCGINNESS
Preparer's signature: _____
Date: _____
Check if self-employed PTIN: P01017591

Firm's name: ▶ HUEBNER DOOLEY & MCGINNESS, PS
Firm's address: ▶ 1424 NE 155TH ST STE 100
SHORELINE, WA 98155-7104
Firm's EIN ▶ 91-1529999
Phone no. (206) 522-8000

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

BAA For Paperwork Reduction Act Notice, see the separate instructions. TEEA0113L 12/21/10 Form 990 (2010)

Return of Organization Exempt From Income Tax

OMB No. 1545-0047

2011

Department of the Treasury
Internal Revenue Service

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code
(except black lung benefit trust or private foundation)

Open to Public Inspection

The organization may have to use a copy of this return to satisfy state reporting requirements.

A For the 2011 calendar year, or tax year beginning 4/01, 2011, and ending 3/31, 2012

B Check if applicable:
 Address change
 Name change
 Initial return
 Terminated
 Amended return
 Application pending

C WASHINGTON STATE LABOR COUNCIL, AFL-CIO
314 FIRST AVENUE WEST
SEATTLE, WA 98119

D Employer Identification Number: 91-0668471

E Telephone number: (206) 281-8901

G Gross receipts \$ 3,378,260.

F Name and address of principal officer: LYNNE DODSON
SAME AS C ABOVE

H(a) Is this a group return for affiliates? Yes No
H(b) Are all affiliates included? Yes No
 If 'No,' attach a list (see instructions)

I Tax-exempt status: 501(c)(3) 501(c) (5) (insert no.) 4947(a)(1) or 527

J Website: WWW.WSLC.ORG **H(c)** Group exemption number: 1338

K Form of organization: Corporation Trust Association Other **L** Year of Formation: 1957 **M** State of legal domicile: WA

Part I Summary

Activities & Governance	1 Briefly describe the organization's mission or most significant activities: <u>THE ORGANIZATION'S PRIMARY EXEMPT PURPOSE IS TO PROTECT AND STRENGTHEN THE RIGHTS AND CONDITIONS OF WORKING PEOPLE AND THEIR FAMILIES.</u>		
	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.		
	3	Number of voting members of the governing body (Part VI, line 1a)	29
	4	Number of independent voting members of the governing body (Part VI, line 1b)	27
	5	Total number of individuals employed in calendar year 2011 (Part V, line 2a)	33
	6	Total number of volunteers (estimate if necessary)	0
	7a	Total unrelated business revenue from Part VIII, column (C), line 12	0.
	7b	Net unrelated business taxable income from Form 990-T, line 34	0.
Revenue	8	Contributions and grants (Part VIII, line 1h)	Prior Year: 1,226,435. Current Year: 984,653.
	9	Program service revenue (Part VIII, line 2g)	2,402,935. 2,656,353.
	10	Investment income (Part VIII, column (A), lines 3, 4, and 7d)	121. 88.
	11	Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	-140,071. -262,834.
	12	Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	3,489,420. 3,378,260.
Expenses	13	Grants and similar amounts paid (Part IX, column (A), lines 1-3)	17,868. 9,946.
	14	Benefits paid to or for members (Part IX, column (A), line 4)	
	15	Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	2,598,769. 2,354,824.
	16a	Professional fundraising fees (Part IX, column (A), line 11e)	
	b	Total fundraising expenses (Part IX, column (D), line 25)	
	17	Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	1,382,468. 967,167.
18	Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	3,999,105. 3,331,937.	
19	Revenue less expenses. Subtract line 18 from line 12	-509,685. 46,323.	
Net Assets or Fund Balances	20	Total assets (Part X, line 16)	Beginning of Current Year: 1,252,881. End of Year: 984,514.
	21	Total liabilities (Part X, line 26)	3,235,391. 3,766,363.
	22	Net assets or fund balances. Subtract line 21 from line 20	-1,982,510. -2,781,849.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature of officer: LYNNE DODSON Date: SECRETARY-TREASURER

Paid Preparer Use Only

Print/Type preparer's name: CHRIS MCGINNESS Preparer's signature: Date: Check if self-employed PTIN: P01017591

Firm's name: HUEBNER DOOLEY & MCGINNESS, PS Firm's address: 1424 NE 155TH ST STE 100 SHORELINE, WA 98155-7104 Firm's EIN: 91-1529999 Phone no.: (206) 522-8000

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

Return of Organization Exempt From Income Tax
Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

OMB No. 1545-0047
2012
Open to Public Inspection

The organization may have to use a copy of this return to satisfy state reporting requirements.

A For the 2012 calendar year, or tax year beginning **APR 1, 2012** and ending **MAR 31, 2013**

B Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	C Name of organization WASHINGTON STATE LABOR COUNCIL AFL-CIO		D Employer identification number 91-0668471
	Doing Business As		E Telephone number 206-281-8901
	Number and street (or P.O. box if mail is not delivered to street address)	Room/suite	G Gross receipts \$ 4,113,180.
	314 1ST AVE W		H(a) Is this a group return for affiliates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all affiliates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. (see instructions) H(c) Group exemption number 1338
City, town, or post office, state, and ZIP code SEATTLE, WA 98119		F Name and address of principal officer: LYNNE DODSON 314 1ST AVE W, SEATTLE, WA 98119	
I Tax-exempt status: <input type="checkbox"/> 501(c)(3) <input checked="" type="checkbox"/> 501(c)(5) (insert no.) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527			
J Website: WWW.WSLC.ORG			
K Form of organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other			L Year of formation: 1957 M State of legal domicile: WA

Part I Summary

Activities & Governance	1 Briefly describe the organization's mission or most significant activities: THE ORGANIZATION'S PRIMARY EXEMPT PURPOSE IS TO TO PROTECT AND STRENGTHEN THE RIGHTS AND	
	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.	
	3 Number of voting members of the governing body (Part VI, line 1a)	3 29
	4 Number of independent voting members of the governing body (Part VI, line 1b)	4 27
	5 Total number of individuals employed in calendar year 2012 (Part V, line 2a)	5 30
	6 Total number of volunteers (estimate if necessary)	6 0
	7 a Total unrelated business revenue from Part VIII, column (C), line 12	7a 0.
b Net unrelated business taxable income from Form 990-T, line 34	7b 0.	
Revenue	8 Contributions and grants (Part VIII, line 1h)	Prior Year 984,653. Current Year 599,674.
	9 Program service revenue (Part VIII, line 2g)	2,656,353. 3,436,309.
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)	88. 123.
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	-262,834. 77,074.
	12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	3,378,260. 4,113,180.
Expenses	13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)	9,946. 0.
	14 Benefits paid to or for members (Part IX, column (A), line 4)	0. 0.
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	2,354,824. 2,823,940.
	16 a Professional fundraising fees (Part IX, column (A), line 11e)	0. 0.
	b Total fundraising expenses (Part IX, column (D), line 25)	0.
	17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	967,167. 1,418,657.
18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	3,331,937. 4,242,597.	
19 Revenue less expenses. Subtract line 18 from line 12	46,323. -129,417.	
Net Assets or Fund Balances	20 Total assets (Part X, line 16)	Beginning of Current Year 984,514. End of Year 830,254.
	21 Total liabilities (Part X, line 26)	3,766,363. 3,726,208.
	22 Net assets or fund balances. Subtract line 21 from line 20	-2,781,849. -2,895,954.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer	Date			
	LYNNE DODSON, SECRETARY-TREASURER Type or print name and title				
Paid Preparer Use Only	Print/Type preparer's name ALLEN GILBERT, CPA	Preparer's signature ALLEN GILBERT, CPA	Date 01/25/14	Check <input type="checkbox"/> if self-employed	PTIN P01380103
	Firm's name CLIFTONLARSONALLEN LLP	Firm's EIN 41-0746749	Phone no. (425) 250-6100		
Firm's address 3000 NORTHUP WAY, SUITE 200 BELLEVUE, WA 98004					

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

Form **990**

OMB No. 1545-0047

Return of Organization Exempt From Income Tax
 Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)
 ▶ Do not enter Social Security numbers on this form as it may be made public.
 ▶ Information about Form 990 and its instructions is at www.irs.gov/form990.

2013

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

A For the 2013 calendar year, or tax year beginning **4/01**, 2013, and ending **3/31**, 2014

B Check if applicable: <input checked="" type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	C WASHINGTON STATE LABOR COUNCIL, AFL-CIO 321 16TH AVENUE SOUTH SEATTLE, WA 98144	D Employer identification number 91-0668471 E Telephone number (206) 281-8901 G Gross receipts \$ 3,691,462.
F Name and address of principal officer: LYNNE DODSON SAME AS C ABOVE		H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No (If No, attach a list. (see instructions))
I Tax-exempt status: <input type="checkbox"/> 501(c)(3) <input checked="" type="checkbox"/> 501(c) (5) (insert no.) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527		
J Website: ▶ WWW.WSLC.ORG		
K Form of organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other ▶		L Year of formation: 1957 M State of legal domicile: WA

Part I Summary

	1 Briefly describe the organization's mission or most significant activities: <u>TO PROTECT AND STRENGTHEN THE RIGHTS AND CONDITIONS OF WORKING PEOPLE AND THEIR FAMILIES.</u>			
Activities & Governance	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.			
	3 Number of voting members of the governing body (Part VI, line 1a)	3		28
	4 Number of independent voting members of the governing body (Part VI, line 1b)	4		26
	5 Total number of individuals employed in calendar year 2013 (Part V, line 2a)	5		33
	6 Total number of volunteers (estimate if necessary)	6		0
	7a Total unrelated business revenue from Part VIII, column (C), line 12	7a		0.
	b Net unrelated business taxable income from Form 990-T, line 34	7b		0.
Revenue	8 Contributions and grants (Part VIII, line 1h)	599,674.	Prior Year	837,405.
	9 Program service revenue (Part VIII, line 2g)	3,436,309.	Current Year	2,779,350.
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)	123.		61.
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	77,074.		74,646.
	12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	4,113,180.		3,691,462.
Expenses	13 Grants and similar amounts paid (Part IX, column (A), lines 1-3)			10,626.
	14 Benefits paid to or for members (Part IX, column (A), line 4)			
	15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	2,823,940.		2,588,236.
	16a Professional fundraising fees (Part IX, column (A), line 11e)			
	b Total fundraising expenses (Part IX, column (D), line 25) ▶			
17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	1,418,657.		998,490.	
18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	4,242,597.		3,597,352.	
19 Revenue less expenses. Subtract line 18 from line 12	-129,417.		94,110.	
Net Assets or Fund Balances	20 Total assets (Part X, line 16)	830,254.	Beginning of Current Year	709,914.
	21 Total liabilities (Part X, line 26)	3,726,208.	End of Year	3,183,519.
	22 Net assets or fund balances. Subtract line 21 from line 20	-2,895,954.		-2,473,605.

Part II Signature Block

Under penalties of perjury I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer	Date			
	LYNNE DODSON Type or print name and title.		SECRETARY-TREASURER		
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	CHRIS MCGINNESS		11/07/14		P01017591
	Firm's name ▶ HUEBNER DOOLEY & MCGINNESS, PS Firm's address ▶ 1424 NE 155TH ST STE 100 SHORELINE, WA 98155-7104			Firm's EIN ▶ 91-1529999	Phone no. (206) 522-8000

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

BAA For Paperwork Reduction Act Notice, see the separate instructions. TEEA0113L 11/08/13 Form 990 (2013)

Form **990**

OMB No. 1545-0047

Return of Organization Exempt From Income Tax
 Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)
 Do not enter social security numbers on this form as it may be made public.
 Information about Form 990 and its instructions is at www.irs.gov/form990.

2014

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

A For the 2014 calendar year, or tax year beginning 4/01, 2014, and ending 3/31, 2015

B Check if applicable:
 Address change
 Name change
 Initial return
 Final return/terminated
 Amended return
 Application pending

C **WASHINGTON STATE LABOR COUNCIL, AFL-CIO**
 321 16TH AVENUE SOUTH
 SEATTLE, WA 98144

D Employer identification number
 91-0668471

E Telephone number
 (206) 281-8901

G Gross receipts \$ 4,362,953.

F Name and address of principal officer: LYNNE DODSON
 SAME AS C ABOVE

H(a) Is this a group return for subordinates? Yes No
H(b) Are all subordinates included? Yes No
 If 'No,' attach a list. (see instructions)

I Tax-exempt status 501(c)(3) 501(c) (5) (insert no.) 4947(a)(1) or 527

J Website: WWW.WSLC.ORG

K Form of organization: Corporation Trust Association Other

L Year of formation: 1957 **M** State of legal domicile: WA

H(c) Group exemption number ▶

Part I Summary

1 Briefly describe the organization's mission or most significant activities: TO PROTECT AND STRENGTHEN THE RIGHTS AND CONDITIONS OF WORKING PEOPLE AND THEIR FAMILIES.

2 Check this box if the organization discontinued its operations or disposed of more than 25% of its net assets.

3	Number of voting members of the governing body (Part VI, line 1a)	3	31
4	Number of independent voting members of the governing body (Part VI, line 1b)	4	29
5	Total number of individuals employed in calendar year 2014 (Part V, line 2a)	5	29
6	Total number of volunteers (estimate if necessary)	6	0
7a	Total unrelated business revenue from Part VIII, column (C), line 12	7a	0.
7b	Net unrelated business taxable income from Form 990-T, line 34	7b	0.

	Prior Year	Current Year	
8	Contributions and grants (Part VIII, line 1h)	837,405.	1,501,345.
9	Program service revenue (Part VIII, line 2g)	2,779,350.	2,776,856.
10	Investment income (Part VIII, column (A), lines 3, 4, and 7d)	61.	57.
11	Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	74,646.	84,695.
12	Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	3,691,462.	4,362,953.
13	Grants and similar amounts paid (Part IX, column (A), lines 1-3)	10,626.	12,182.
14	Benefits paid to or for members (Part IX, column (A), line 4)		
15	Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	2,588,236.	2,499,783.
16a	Professional fundraising fees (Part IX, column (A), line 11e)		
b	Total fundraising expenses (Part IX, column (D), line 25) ▶		
17	Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	998,490.	1,622,211.
18	Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	3,597,352.	4,134,176.
19	Revenue less expenses. Subtract line 18 from line 12	94,110.	228,777.

	Beginning of Current Year	End of Year	
20	Total assets (Part X, line 16)	709,914.	715,962.
21	Total liabilities (Part X, line 26)	3,183,519.	3,283,997.
22	Net assets or fund balances. Subtract line 21 from line 20	-2,473,605.	-2,568,035.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature of officer: LYNNE DODSON Date: _____
 SECRETARY-TREASURER

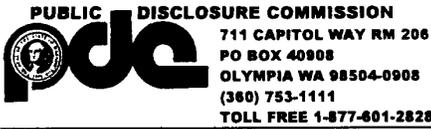
Type or print name and title.

Paid Preparer Use Only

Print/Type preparer's name: CHRIS MCGINNESS Preparer's signature: *Chris McGinness* Date: 9/04/15 Check if self-employed PTIN: P01017591

Firm's name: HUEBNER DOOLEY & MCGINNESS, PS Firm's EIN: 91-1529999
 Firm's address: 1424 NE 155TH ST STE 100 Phone no.: (206) 522-8000
SHORELINE, WA 98155-7104

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No



**Employer of Lobbyist Monthly
Political Contribution Report**

L-3C
1/02

THIS SPACE FOR OFFICE USE

Employer's Name (Use complete company, association, union or entity name.)
Washington State Labour Council

DATE FILED PDC
DEC - 8 2010

Mailing Address
314 1st Ave West

City State Zip
Seattle WA 98119

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

What Must Be Reported: Contributions, including a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, or transfer of anything of value, including personal and professional services for less than full consideration. Contributions to campaign accounts and public office fund accounts are reportable.

When Is The Report Filed: Within 15 days after the last day of each calendar month during which reportable contributions were made. Reports are considered filed as of the post mark or hand-delivery date to PDC.

Itemize contributions that alone, or together with other contributions to the same recipient, total over \$100 during the calendar month specified above. If space provided is insufficient, use additional L-3c forms or 8 1/2" x 11" white paper.

Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
November 1 through November 30, 2010	WA State Labor Council PPP Committee 314 1st Ave W Seattle WA	Salary/Benefits (in kind)	\$ 280.00
"	Same As Above	Supplies (in kind)	40.00
"	Same As Above	Printing (in kind)	60.00
"	Same As Above	Postage (in kind)	80.00
"	Same As Above	Legal/Acct (in kind)	50.00

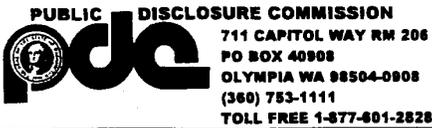
*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf
Alan O. Link, Secretary-Treasurer

Signature
Alan O Link

Date
December 8, 2010



Employer of Lobbyist Monthly Political Contribution Report

L-3C

1/02

THIS SPACE FOR OFFICE USE

DATE FILED PDC

JAN -5 2011

Employer's Name (Use complete company, association, union or entity name.)
Washington State Labour Council

Mailing Address
314 1st Ave West

City State Zip
Seattle WA 98119

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

What Must Be Reported: Contributions, including a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, or transfer of anything of value, including personal and professional services for less than full consideration. Contributions to campaign accounts and public office fund accounts are reportable.

When Is The Report Filed: Within 15 days after the last day of each calendar month during which reportable contributions were made. Reports are considered filed as of the post mark or hand-delivery date to PDC.

Itemize contributions that alone, or together with other contributions to the same recipient, total over \$100 during the calendar month specified above. If space provided is insufficient, use additional L-3c forms or 8 1/2" x 11" white paper.

Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
December 1 through December 31, 2010	WA State Labor Council PPP Committee 314 1st Ave W Seattle WA	Salary/Benefits (in kind)	\$ 280.00
"	Same As Above	Supplies (in kind)	40.00
"	Same As Above	Printing (in kind)	60.00
"	Same As Above	Postage (in kind)	80.00
"	Same As Above	Legal/Acct (in kind)	50.00

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf	Signature	Date
Alan O. Link, Secretary-Treasurer		1-5-2011



Employer of Lobbyist Monthly Political Contribution Report

L-3C
1/02

THIS SPACE FOR OFFICE USE
DATE FILED PDC

FEB 14 2011

Employer's Name (Use complete company, association, union or entity name.)
Washington State Labor Council

Mailing Address
314 1st Ave W

City State Zip
Seattle WA 98119

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

What Must Be Reported: Contributions, including a loan, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, or transfer of anything of value, including personal and professional services for less than full consideration. Contributions to campaign accounts and public office fund accounts are reportable.

When Is The Report Filed: Within 15 days after the last day of each calendar month during which reportable contributions were made. Reports are considered filed as of the post mark or hand-delivery date to PDC.

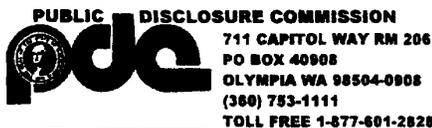
Itemize contributions that alone, or together with other contributions to the same recipient, total over \$100 during the calendar month specified above. If space provided is insufficient, use additional L-3c forms or 8 1/2" x 11" white paper.

Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
January 1 - 31 2011	Washington St. Labor Co. PPP Committee - 314 1 st Ave W. Sea. 98119	Salary/Benefits (in-kind)	\$ 280.00
" "	" "	Supplies (in-kind)	40.00
" "	" "	Printing (in-kind)	60.00
" "	" "	Postage (in-kind)	80.00
" "	" "	Legal/Acct (in-kind)	50.00

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf: Lynne Dodson, Secretary/Treasurer
Signature:
Date: 2/14/11



Employer of Lobbyist Monthly Political Contribution Report

L-3c
1/02

THIS SPACE FOR OFFICE USE

DATE FILED PDC

Employer's Name (Use complete company, association, union or entity name.)

Washington State Labor Council

MAR 15 2011

Mailing Address

314 1st Ave West

City

State

Zip

Seattle WA 98119

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

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Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
February 1-28 2011	Washington State Labor Council PPP Committee 314 1st Ave W. Seattle 98119	Salary/Benefits (in-kind)	\$ 280.00
" "	" "	Supplies (in-kind)	40.00
" "	" "	Printing (in-kind)	60.00
" "	" "	Postage (in-kind)	80.00
" "	" "	Legal/Acct (in-kind)	50.00

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf

Signature

Date

Lynne Dodson, Secretary/Treasurer

3/15/11



PUBLIC DISCLOSURE COMMISSION
 711 CAPITOL WAY RM 200
 PO BOX 40908
 OLYMPIA WA 98504-0908
 (360) 753-1111
 TOLL FREE 1-877-601-2828

**Employer of Lobbyist Monthly
 Political Contribution Report**

L-3c
 1/02

THIS SPACE FOR OFFICE USE

DATE FILED PDC
 MAY 18 2011

Employer's Name (Use complete company, association, union or entity name.)
Washington State Labor Council

Mailing Address
314 1st Ave West

City State Zip
Seattle WA 98119

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

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April 1- 30 2011	Washington State Labor Council PPP Committee 314 1st Ave W. Seattle 98119	Salary/Benefits (in-kind)	\$ 280.00
" "	" "	Supplies (in-kind)	40.00
" "	" "	Printing (in-kind)	60.00
" "	" "	Postage (in-kind)	80.00
" "	" "	Legal/Acct (in-kind)	50.00

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf	Signature	Date
Lynne Dodson, Secretary/Treasurer		5/18/11



PUBLIC DISCLOSURE COMMISSION
 711 CAPITOL WAY RM 208
 PO BOX 40908
 OLYMPIA WA 98504-0908
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**Employer of Lobbyist Monthly
 Political Contribution Report**

L-3c
 1/02

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DATE FILED PDC

MAY 18 2011

Employer's Name (Use complete company, association, union or entity name.)
 Washington State Labor Council

Mailing Address
 314 1st Ave West

City State Zip
 Seattle WA 98119

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March 1- 31 2011	Washington State Labor Council PPP Committee 314 1st Ave W. Seattle 98119	Salary/Benefits (in-kind)	\$ 280.00
" "	" "	Supplies (in-kind)	40.00
" "	" "	Printing (in-kind)	60.00
" "	" "	Postage (in-kind)	80.00
" "	" "	Legal/Acct (in-kind)	50.00

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Name and title of person authorized to sign on employer's behalf	Signature	Date
Lynne Dodson, Secretary/Treasurer		5/18/11



Employer of Lobbyist Monthly Political Contribution Report

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1/02

DATE FILED PDC
JUL 19 2011

PUBLIC DISCLOSURE COMMISSION
711 CAPITOL WAY RM 206
PO BOX 40908
OLYMPIA WA 98504-0908
(360) 753-1111
TOLL FREE 1-877-601-2828

Employer's Name (Use complete company, association, union or entity name.)
Washington State Labor Council

Mailing Address
314 1st Ave W

City State Zip
Seattle WA 98119

Who Must File Report: Employers of lobbyists registered in Washington State making one or more contributions, including in-kind contributions, during one calendar month totaling more than \$100 to a candidate for state or local office, an elected state or local official, an officer or employee of any public agency, or a political committee. *Employer contributions made through and reported by a registered lobbyist or an employer-affiliated PAC are not reportable on an L-3c*

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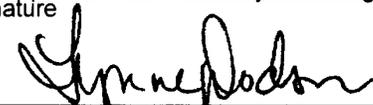
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Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
May 1-31, 2011	Washington St. Labor Co. PPP Committee - 314 1 st Ave W. Sea. 98119	Salary/Benefits (in-kind)	\$ 280.00
" "	" "	Supplies (in-kind)	40.00
" "	" "	Printing (in-kind)	60.00
" "	" "	Postage (in-kind)	80.00
" "	" "	Legal/Acct (in-kind)	50.00

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf: Lynne Dodson, Secretary/Treasurer Signature:  Date: 7/18/11



Employer of Lobbyist Monthly Political Contribution Report

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L-3C
1/02
DATE FILED PDC
JUL 19 2011

PUBLIC DISCLOSURE COMMISSION
711 CAPITOL WAY RM 206
PO BOX 40908
OLYMPIA WA 98504-0908
(360) 753-1111
TOLL FREE 1-877-601-2828

Employer's Name (Use complete company, association, union or entity name.)
Washington State Labor Council
Mailing Address
314 1st Ave W
City State Zip
Seattle WA 98119

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Table with 4 columns: Date of Contribution, Name and Address of Recipient, Description of Contribution*, Amount or Value*. Rows include: June 1-30, 2011, Washington St. Labor Co. PPP Committee - 314 1st Ave W. Sea. 98119, Salary/Benefits (in-kind), \$ 280.00; Supplies (in-kind), 40.00; Printing (in-kind), 60.00; Postage (in-kind), 80.00; Legal/Acct (in-kind), 50.00.

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.
Name and title of person authorized to sign on employer's behalf: Lynne Dodson, Secretary/Treasurer
Signature: [Handwritten Signature]
Date: 7/18/11



**Employer of Lobbyist Monthly
Political Contribution Report**

L-3C
1/02

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DATE FILED PDC

FEB 16 2012

Employer's Name (Use complete company, association, union or entity name.)
Washington State Labour Council

Mailing Address
314 1st Ave West

City	State	Zip
Seattle	WA	98119

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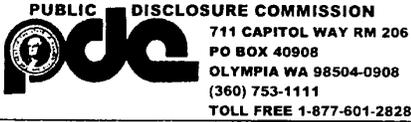
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Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
1/1/12-1/31/12	WA State Labor Council PPP Committee 314 1st Ave W Seattle WA	Salary/Benefits (in kind)	\$ 280.00
	Same As Above	Supplies (in kind)	40.00
	Same As Above	Printing (in kind)	60.00
	Same As Above	Postage (in kind)	80.00
	Same As Above	Legal/Acct (in kind)	50.00

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf Lynne Dodson, Secretary-Treasurer	Signature 	Date 2/15/12
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Employer of Lobbyist Monthly Political Contribution Report

L-3c
1/02

THIS SPACE FOR OFFICE USE

DATE FILED PDC

OCT 12 2012

Employer's Name (Use complete company, association, union or entity name.)
 Washington State Labor Council, AFL-CIO

Mailing Address
 314 1st Avenue West

City Seattle State WA Zip 98119

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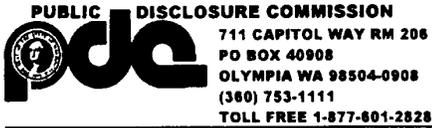
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Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
10/03/12	People for Our Public Schools 1914 N 34th St Ste 209 Seattle, WA 98103	Monetary	\$ 10,000.00
10/03/12	No on 1185 603 Stewart St #819 Seattle, WA 98101	Monetary	\$ 5,000.00
10/03/12	Washington United for Marriage PO Box 21022 Seattle, WA 98111	Monetary	\$ 5,000.00

*See next page for details.

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Name and title of person authorized to sign on employer's behalf	Signature	Date
Lynne Dodson, Secretary-Treasurer		10/12/12



**Employer of Lobbyist Monthly
Political Contribution Report**

L-3C
1/02

THIS SPACE FOR OFFICE USE

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SEP 13 2013

Employer's Name (Use complete company, association, union or entity name.)
 Mailing Address
 City State Zip

Washington State Labor Council, AFL-CIO

314 1st Avenue West

Seattle

WA

98119

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Date of Contribution	Name and Address of Recipient	Description of Contribution*	Amount or Value*
8/28/13	Yes for Seatac PO Box 69257 Seatac, WA 98168	Contribution to campaign	\$ 5,000

*See next page for details.

Certification: I certify that the information contained herein is true and complete to the best of my knowledge.

Name and title of person authorized to sign on employer's behalf Signature Date

Lynne Dodson, Secretary Treasurer

9-13-13