

**Executive Summary and Staff Analysis**  
**Service Employees International Union Local 925**  
**(45-Day Citizen Action Complaint)**  
**PDC Case No. 15-068**

This summary highlights staff's findings, conclusions, and recommendations regarding the allegations contained in PDC Case No. 15-068, a 45-Day Citizen Action Complaint (Complaint) filed on August 13, 2015 by James G. Abernathy and David M.S. Dewhirst of the Freedom Foundation against Service Employees International Union Local 925 (SEIU 925) and Karen Hart, Tricia Schroeder, and Cindy Elizalde in their respective capacities as President, Vice President, and Secretary-Treasurer of SEIU 925.

**Background**

The Citizen Action Complaint was filed with the Washington Attorney General's Office and referred to the PDC for investigation and possible action on August 21, 2015. On August 26, 2015, PDC staff sent a letter to SEIU 925, informing them that staff had opened a formal investigation, and requesting a written response to the allegations and to several staff questions by September 8, 2015. **(See Exhibit 1 – Complaint)** On September 22, 2015, staff informed SEIU 925 that it was postponing its scheduled report to the Commission on September 24, 2015, and requested additional information about the union's activities.

**Allegations**

The Citizen Action Complaint included three allegations, with the third allegation containing four components:

**First Allegation:** That SEIU 925 is a political committee because it has an expectation of receiving contributions and making expenditures in support of, or in opposition to candidates or ballot propositions. The complaint alleged that as a political committee, SEIU 925 has failed to register and report with the PDC.

**Second Allegation:** That SEIU 925, as a lobbyist employer, has failed to file special reports of contributions (PDC form L-3C) for in-kind contributions (reportable if aggregating more than \$110 in a calendar month) to several political committees, including its continuing political committee, SEIU Local 925 Public Service PAC.

**Third Allegation:** That SEIU 925 and its officers sent a political advertising letter on or about July 17, 2015 to Individual Providers (IPs) who were nonmembers of the union, soliciting them to join the union, and as full members to authorize contributions through payroll deductions to the international union's political committee, SEIU Committee on Political Education (SEIU COPE), a committee registered with and reporting to the Federal Election Commission. The complaint alleged that sending this political advertising letter triggered several violations, as follows:

1. That SEIU 925 and its officers, as a political committee, failed to report the receipt of contributions authorized by IPs joining the union in response to the July 17, 2015 letter as contributions earmarked for SEIU COPE. (RCW 42.17A.270)
2. That, in the alternative, if the PDC determines that SEIU 925 is not a political committee, SEIU 925 failed to report the July 17, 2015 letter as an independent expenditure not otherwise required to be reported. (RCW 42.17A.255)
3. That SEIU 925 and its officers failed to report the July 17, 2015 letter as independent expenditure political advertising within 24 hours of mailing the letter, a requirement for political advertising mailed within 21 days of an election with a fair market value of \$1,000 or more. (RCW 42.17A.260)
4. That SEIU 925 and its officers failed to timely report the July 17, 2015 letter as an electioneering communication within 24 hours of mailing the letter, a requirement for an electioneering communication mailed within 60 days of an election that clearly identifies a candidate for a state, local or judicial office either by specifically naming the candidate, or by identifying the candidate without using the candidate's name, with a fair market value of \$1,000 or more. (RCW 42.17A.305)

### **Investigative Findings (See Exhibits 2 and 3 - Responses to Complaint)**

**First Allegation:** The Commission's Interpretation 07-02, "Primary Purpose Test" Guidelines, sets forth two alternative prongs under which an individual or organization may become a political committee and subject to the Act's reporting requirements: (1) a "receiver of contributions" prong; and (2) a "making of expenditures to further electoral political goals" prong. A requirement of the "making of expenditures" prong states that the organization making expenditures must have as its "primary or one of its primary purposes ... to affect, directly or indirectly, governmental decision making by supporting or opposing candidates or ballot propositions ..." WA Court of Appeals, *Evergreen Freedom Foundation v. Washington Education Association*, 2003. In *Utter v. BIAW*, the Washington Supreme Court subsequently held that candidate or ballot proposition expenditures need be only *one* of a person's primary purpose, and not *the* primary purpose in order to meet the definition of a political committee.

In discussing the "maker of expenditures" prong of the political committee definition, Interpretation 07-02 states that an appropriate framework for determining whether electoral political activity is one of the organization's primary purposes should include an examination of the stated goals and mission of the organization and whether electoral political activity is a primary means of achieving the stated goals and mission during the period in question. A nonexclusive list of analytical tools that may be used to evaluate the evidence includes: (1) the content of the stated goals and mission of the organization; (2) whether the organization's actions further its stated goals and mission; (3) whether the stated goals and mission of the organization would be substantially

achieved by a favorable outcome in an upcoming election; and (4) whether the organization uses means other than electoral political activity to achieve its stated goals.

Receiver of Contributions Prong: The complaint alleged that SEIU 925 is a political committee because it has an expectation of receiving contributions, and is a receiver of contributions. This argument is based on the fact that in a July 17, 2015 letter, SEIU 925 asked IPs who are nonmembers to join the union as full members, and after joining, to authorize their employer to withhold an indicated amount per month from their pay and forward it to SEIU 925 as a contribution to SEIU COPE.

SEIU 925's role in these transactions was to ask nonmembers to become full members and to authorize payroll deductions for contributions to SEIU COPE. In soliciting contributions to a federal political committee, SEIU 925 was not a receiver of contributions under RCW 42.17A, nor do these actions demonstrate an expectation of receiving contributions reportable under RCW 42.17A. These activities do not make SEIU 925 a political committee. In addition, Federal law permits SEIU 925 to receive voluntary contributions for its international union's PAC without limit and without being a political committee. SEIU 925 states that it is compliant with federal regulations that require it to forward the contributions to SEIU COPE within 30 days for contributions of \$50 or less and within 10 days for contributions in excess of \$50.

Maker of Expenditures Prong: The complaint also alleged that SEIU 925 is a political committee because one of its primary purposes is to make expenditures supporting or opposing candidates or ballot propositions.

To address this allegation, PDC staff reviewed evidence relevant to the analysis recommended by the EFF v. WEA court. SEIU 925's stated mission is to *"win political and economic power for working people and to advance the well-being of our members, their families, and all working people by developing leaders who are a voice for change in the workplace and solidarity in our communities."* The object of SEIU 925, as stated in Article II, Section 2 of its Constitution and Bylaws, is to *"organize all employees within its jurisdiction; to achieve for its members fair wages, hours and working conditions, together with active participation in the policies and operations of their work places; to promote recognition and respect for the value of its members' work; and to follow democratic principles."* SEIU 925 stated that electoral political activity is at most just one aspect of the means by which it seeks to accomplish its goals.

SEIU 925 stated that it represents employees across Washington, at worksites including the University of Washington, public schools, early learning centers, and local government and nonprofit locations. SEIU 925 staff members bargain on behalf of its members to secure a collective bargaining agreement (CBA) with the employer, uphold the rights provided by the CBA, and work with management to solve problems. SEIU 925 also represents members during the dispute resolution process with the employer, including grievance arbitration. SEIU 925 works to improve wages, benefits, and working conditions for its members. Its expenditures go towards administering labor

agreements, providing member support, and paying for staff needed to provide representational services.

No evidence was submitted to contradict SEIU 925's public statements concerning the union's mission or the object of the Local. No evidence was provided demonstrating that SEIU 925 has merely restated its primary political purpose in broad nonpolitical terms. No non-financial evidence was provided showing that supporting candidates or ballot proposition campaigns was a top priority for SEIU 925 during either of the two years subject to the Citizen Action Notice. Staff found that SEIU 925's electoral political activity may have furthered its stated goals and mission. However, no evidence was found that SEIU 925 has substantially achieved its stated goals and mission by a favorable outcome in an election nor was any specific election campaign cited in the allegations. It is clear that SEIU 925 uses means other than electoral political activity to achieve its stated goals.

#### Financial Evidence of Expenditure Prong

To demonstrate that SEIU 925 is a political committee during the two-year period subject to the Citizen Action Notice, the Complaint stated that on October 8, 2002, SEIU 925 self-identified as a political committee and renewed its registration on February 10, 2012, registering as Service Employees International Union Local 925. The complaint states that SEIU 925 filed a final report on April 10, 2012 and transferred its remaining funds, approximately \$286,000, to its new political committee, SEIU Local 925 Public Service PAC. The complaint alleged that SEIU 925 (the union) continues to operate as an unregistered political committee. SEIU 925 acknowledged that it registered a PAC as noted by the Complaint, but stated that the registration and reporting was for its PAC that bore the union's name, and denied that the union itself was a political committee.

In support of its allegation that SEIU 925 is a political committee, the Complaint alleged that according to SEIU 925's 2014 LM-2, a federal labor report, SEIU 925 spent nearly 19% of all funds collected to affect federal, state, and local elections. (See Exhibit H of Complaint), and that SEIU 925 spent more on electioneering than it spent on benefits for its represented workers, more than it spent for general overhead, and over five times more than it spent on union administration, citing Exhibit H of the Complaint. The Complaint also stated that in 2014 alone, SEIU 925 spent \$1,429,554 on Washington elections.

SEIU 925 responded by stating that the \$1,429,554 cited by the Complaint as having been spent on Washington elections in 2014 was a misrepresentation of information taken from the PDC database, and actually covered the period July 2012 through November 2014. SEIU 925 stated that its actual spending for elections during the 2014 election cycle was \$988,139. SEIU 925 stated that this amount equals 9.71% of total disbursements during 2014 (\$988,139/\$10,177,521 – Exhibit H to Complaint). SEIU 925 stated that the amount it spent on representational activities and benefits for members during 2014 (\$4,518,137) was more than four times the amount it spent on contributions (\$988,139).

PDC staff reviewed the Commission's database for contributions made by SEIU 925 during the two-year period covered by the Complaint, and the five-year period preceding the date staff expects to present the matter to the Commission, and found contributions during 2014 of approximately \$1,119,906.59, which is 11% of total expenditures (\$1,119,907/\$10,177,521). **(See Exhibit 6, Page 12)** SEIU 925 stated that only a small proportion of its expenditures were spent on electoral political activity, and that no evidence to the contrary has been presented.

During 2013, SEIU 925's total expenditures were reported as \$8,753,124, and expenditures for contributions to candidates and ballot propositions, identified by staff from the Commission's database, totaled \$14,500, or 0.17% of total expenditures. **(See Exhibit 6, Page 12)** SEIU 925 expects its 2015 total expenditures to be approximately equal to its 2014 expenditure level of \$8,753,124, and its 2015 contributions to candidates and ballot propositions itemized through August 2015, totaled \$4,350. **(See Exhibit 6, Page 12)**

**Second Allegation:** That SEIU 925, as a lobbyist employer, has failed to file special reports of contributions (PDC form L-3C) for in-kind contributions to several political committees, including its continuing political committee, SEIU Local 925 Public Service PAC. In responding to the Citizen Action Notice, SEIU 925 initially denied that any of its staff members performed more than incidental PAC related functions that exceeded \$100 in any month during the period covered by the Complaint for operating the union's PAC, and did not address whether all monetary and in-kind contributions had been reported on L-3C reports. PDC staff asked SEIU 925 to review the services performed by its staff, including Adair Dammann, the union's then Secretary-Treasurer, and a Committee Officer for SEIU Local 925 Public Service PAC, and Karen Hart, a Committee Officer of the PAC, and to file L-3C reports as needed to report staff time and any appropriate overhead for running and making decisions for its PAC. SEIU 925 stated that given the time frame they are unable to provide additional specific information regarding the value of any in-kind contributions it has provided to its PAC.

A lobbyist employer is relieved of filing L-3C reports if contributions are reported on the monthly L-2 reports of its lobbyists. PDC staff identified \$1,127,406.59 reported as itemized contributions received by candidates and political committees from SEIU 925 during the two-year period covered by the Complaint (August 13, 2013 – August 13, 2015), including a \$136,767.18 contribution received by SEIU Local 925 Public Service PAC from SEIU 925 on December 22, 2014. **(See Exhibit 4)** Staff found no L-3C reports filed during this same period, and L-2 reports totaling \$809,358.46 in reported contributions, indicating that SEIU 925 failed to report approximately \$318,048.13 in contributions on L-3C reports. **(See Exhibit 5)** The contributions were, however, reported by the recipient candidates and political committees.

PDC staff reviewed a broader period of time than the two-year period covered by Complaint, and identified during the five-year period before October 8, 2015 \$1,874,744.86 reported as itemized contributions received by candidates and political committees from SEIU 925. **(See Exhibit 6)** This review includes the two-year period

covered by the Complaint. Staff found no L-3C reports filed during this five-year period, and found a total of \$832,744.43 in contributions reported on L-2 reports during this same period, indicating that contributions totaling approximately \$1,042,000.43 were not properly identified on L-3C reports by SEIU 925 during the five years before October 8, 2015. The contributions not included on an L-3C report included a \$136,767.18 contribution to its PAC on December 22, 2014. **(See Exhibit 7)** Again, the contributions were reported by the recipient candidates and political committees.

Staff found that while SEIU 925's lobbyists reported significant contributions on monthly L-2 reports, in many instances, contributions were not reported on L-3C or L-2 reports, including a \$136,767.18 contribution to its PAC on December 22, 2014.

### **Third Allegation:**

- That SEIU 925 and its officers, as a political committee, failed to report the receipt of contributions authorized by IPs joining the union in response to the July 17, 2015 letter as contributions earmarked for SEIU COPE. (RCW 42.17A.270). The requirement to complete a report entitled "Earmarked contributions," is reserved for a political committee receiving a contribution earmarked for the benefit of a candidate or another political committee under the jurisdiction of the PDC. Neither occurred in this matter. When a member of SEIU 925 authorizes his or her employer to withhold funds from their wages and submit it to the union to be forwarded to SEIU COPE, a federal political committee, it is a direct contribution to SEIU COPE. It is not being contributed to SEIU 925, earmarked for the benefit of SEIU COPE. In addition, a contribution made to a federal committee is outside the jurisdiction of the PDC.
- If the PDC determines that SEIU 925 is not a political committee, the Complaint offered an alternative allegation that SEIU 925 failed to report the July 17, 2015 letter as an independent expenditure not otherwise required to be reported. (RCW 42.17A.255). PDC staff found that the July 17, 2015 letter was a request that nonunion members join the union by completing an enclosed membership form, and if they join, to authorize voluntary contributions to SEIU COPE, a federal political committee. It was not sent in support of or in opposition to any Washington state candidate or ballot proposition. Therefore, it was not an independent expenditure reportable under RCW 42.17A.255.
- That SEIU 925 and its officers failed to report the July 17, 2015 letter as independent expenditure political advertising within 24 hours of mailing the letter, a requirement for political advertising mailed within 21 days of an election with a fair market value of \$1,000 or more. (RCW 42.17A.260). As noted above, the July 17, 2015 letter was a request that nonunion members join the union and authorize voluntary contributions to SEIU COPE. Even though the letter was sent within 21 days of the August 4, 2015 primary election, it was neither an independent expenditures nor political advertising, and was not required to be reported in accordance with RCW 42.17A.260.

- That SEIU 925 and its officers failed to timely report the July 17, 2015 letter as an electioneering communication within 24 hours of mailing the letter, a requirement for an electioneering communication with a fair market value of \$1,000 or more, mailed within 60 days of an election that clearly identifies a candidate for a state, local or judicial office either by specifically naming the candidate, or by identifying the candidate without using the candidate's name. (RCW 42.17A.305). As noted above, the July 17, 2015 letter was a request that nonunion members join the union and authorize voluntary contributions to SEIU COPE. It did not identify a candidate for a state, local or judicial office either by specifically naming the candidate, or by identifying the candidate without using the candidate's name, and was therefore not an electioneering communication required to be reported in accordance with RCW 42.17A.305.

### **Conclusion**

Based on the factors identified in staff's investigation and described here, staff has concluded that:

**First Allegation:** SEIU 925 is not a political committee with a requirement to register and report with the PDC, and did not violate RCW 42.17A.205, .235, and .240 because it is not a "receiver of contributions" in support of, or in opposition to candidates or ballot propositions, and because making expenditures to support candidates or ballot propositions is not one of the union's primary purposes. Its primary purpose is to represent employees who are members of the union, to achieve for its members fair wages, hours and working conditions, to secure collective bargaining agreements, and to administer those agreements. SEIU 925's electoral political activity may have furthered its stated goals and mission, but no evidence was found that SEIU 925 has substantially achieved its stated goals and mission by a favorable outcome in an election. SEIU 925 uses means other than electoral political activity to achieve its stated goals.

**Second Allegation:** It appears that SEIU 925, as a lobbyist employer, has violated RCW 42.17A.630(2) by failing to report on L-3C reports monetary and in-kind contributions to candidates and political committees during the five-year period preceding October 8, 2015 totaling approximately \$1,042,000.43, and an unknown value of staff time to operate and manage its political committee, SEIU Local 925 Public Service PAC. Staff found that while SEIU 925's lobbyists reported significant contributions on monthly L-2 reports, which in those cases relieved SEIU 925 from the need to file L-3C reports, in many instances, contributions not reported on L-2 reports were also not reported, as required, on L-3C reports, including a \$136,767.18 contribution to its PAC on December 22, 2014.

### **Third Allegation:**

- SEIU 925 and its officers, as a political committee, did not violate RCW 42.17A.270 by failing to report the receipt of contributions authorized by IPs

joining the union in response to the July 17, 2015 letter as contributions earmarked for SEIU COPE. The contributions forwarded to SEIU COPE were not earmarked contributions as contemplated by RCW 42.17A.

- SEIU 925 did not violate RCW 42.17A.255 by failing to report the July 17, 2015 letter as an independent expenditure not otherwise required to be reported. This expenditure was not made in support of or in opposition to any candidate or ballot proposition. The July 17, 2015 letter was a request that nonunion members join the union and authorize voluntary contributions to SEIU COPE, a federal political committee.
- SEIU 925 did not violate RCW 42.17A.260 by failing to report the July 17, 2015 letter as independent expenditure political advertising within 24 hours of mailing the letter. The July 17, 2015 letter was a request that nonunion members join the union and authorize voluntary contributions to SEIU COPE. It was not independent expenditure political advertising.
- SEIU 925 did not violate RCW 42.17A.305 by failing to timely report the July 17, 2015 letter as an electioneering communication within 24 hours of mailing the letter. The July 17, 2015 letter was a request that nonunion members join the union and authorize voluntary contributions to SEIU COPE. It was not an electioneering communication.

### **Recommendation**

For the reasons described above, staff recommends that the Commission recommend to the Attorney General that no further action be taken on the Citizen Action Complaint concerning allegation 1 and the four components of allegation 3.

For allegation 2, staff recommends that the Commission find multiple apparent violations of RCW 42.17.630 and recommend to the Attorney General to take appropriate action concerning SEIU 925's apparent failure to report all of its reportable contributions on L-3C reports when they were not reported on L-2 reports by its lobbyists, including in-kind contributions for the value of staff time and an appropriate amount of overhead to operate and manage its political committee, SEIU Local 925 Public Service PAC.

Staff also recommends that the Commission recommend that the Attorney General take appropriate action for SEIU Local 925 Public Service PAC's apparent failure to report the receipt of in-kind contributions from SEIU 925 for the value of staff time and overhead to manage its operations.

The Commission also has the option of directing staff to continue investigating the amount of unreported in-kind contributions for staff time and overhead to operate and manage SEIU Local 925 Public Service PAC, and schedule an enforcement hearing

concerning allegation 2, including the apparent failure of SEIU Local 925 Public Service PAC to report the receipt of those same in-kind contributions.

### **Applicable Statutes, Rules, and Interpretations**

#### **RCW 42.17A.005(26)**

"Independent expenditure" means an expenditure that has each of the following elements:

(a) It is made in support of or in opposition to a candidate for office by a person who is not (i) a candidate for that office, (ii) an authorized committee of that candidate for that office, (iii) a person who has received the candidate's encouragement or approval to make the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office, or (iv) a person with whom the candidate has collaborated for the purpose of making the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office;

(b) The expenditure pays in whole or in part for political advertising that either specifically names the candidate supported or opposed, or clearly and beyond any doubt identifies the candidate without using the candidate's name; and

(c) The expenditure, alone or in conjunction with another expenditure or other expenditures of the same person in support of or opposition to that candidate, has a value of \*eight hundred dollars or more. A series of expenditures, each of which is under eight hundred dollars, constitutes one independent expenditure if their cumulative value is eight hundred dollars or more.

#### **RCW 42.17A.005(19)(a)**

(19)(a) "Electioneering communication" means any broadcast, cable, or satellite television or radio transmission, United States postal service mailing, billboard, newspaper, or periodical that:

(i) Clearly identifies a candidate for a state, local, or judicial office either by specifically naming the candidate, or identifying the candidate without using the candidate's name;

(ii) Is broadcast, transmitted, mailed, erected, distributed, or otherwise published within sixty days before any election for that office in the jurisdiction in which the candidate is seeking election; and

(iii) Either alone, or in combination with one or more communications identifying the

candidate by the same sponsor during the sixty days before an election, has a fair market value of one thousand dollars or more.

**RCW 42.17A.005(37)**

"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.

**Interpretation 07-02 "Primary Purpose Test" Guidelines**

Interpretation 07-02 is a summary of the "primary purpose test" Guidelines that relate to "political committees" under Washington State law. It sets forth two alternative prongs under which an individual or organization may become a political committee and subject to the Act's reporting requirements: (1) a "receiver of contributions" prong; and (2) a "making of expenditures to further electoral political goals" prong. A requirement of the "making expenditures" prong states that the organization making expenditures must have as its "primary or one of its primary or one of its primary purposes ... to affect, directly or indirectly, governmental decision making by supporting or opposing candidates or ballot propositions ..." (WA Court of Appeals, EFF v. WEA, 2003). In addition, the Interpretation states that an appropriate framework for determining whether electoral political activity is one of the organization's primary purposes should include an examination of the stated goals and mission of the organization and whether electoral political activity is a primary means of achieving the stated goals and mission during the period in question. A nonexclusive list of analytical tools that may be used to evaluate the evidence includes: (1) the content of the stated goals and mission of the organization; (2) whether the organization's actions further its stated goals and mission; (3) whether the stated goals and mission of the organization would be substantially achieved by a favorable outcome in an upcoming election; and (4) whether the organization uses means other than electoral political activity to achieve its stated goals.

**RCW 42.17A.205**

Every political committee shall file a statement of organization with the commission. The statement must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier.

**RCW 42.17A.235 and .240**

Every political committee is required to file ongoing reports of contributions and expenditures at specified intervals.

### **RCW 42.17A.255**

For the purposes of this section the term "independent expenditure" means any expenditure that is made in support of or in opposition to any candidate or ballot proposition and is not otherwise required to be reported pursuant to RCW 42.17A.220, 42.17A.235, and 42.17A.240. Any person making "independent expenditures" not otherwise required to be reported, shall file a C-6 report within five days after the date of making an independent expenditure of \$100 or more.

### **RCW 42.17A.260**

The sponsor of political advertising who, within twenty-one days of an election, publishes, mails, or otherwise presents to the public political advertising supporting or opposing a candidate or ballot proposition that qualifies as an independent expenditure with a fair market value of one thousand dollars or more shall deliver, either electronically or in written form, a special report to the commission within twenty-four hours of, or on the first working day after, the date the political advertising is first published, mailed, or otherwise presented to the public.

### **RCW 42.17A.305**

A payment for or promise to pay for an electioneering communication shall be reported to the Commission on forms developed by the Commission at specified times in a specified manner.

### **RCW 42.17A.615**

Requires a registered lobbyist to file monthly reports of expenditures, including an itemized listing of each contribution of money or of tangible or intangible personal property, whether contributed by the lobbyist personally or delivered or transmitted by the lobbyist, to any candidate, elected official, or officer or employee of any agency, or any political committee supporting or opposing any ballot proposition, or for or on behalf of any candidate, elected official, or officer or employee of any agency, or any political committee supporting or opposing any ballot proposition.

### **RCW 42.17A.630(2)**

Requires an employer of a lobbyist to file a special report with the Commission if the employer makes a contribution or contributions aggregating more than \$110 in a calendar month to a candidate, elected official, officer or employee of an agency, or political committee, unless the contribution is reported by the lobbyist under RCW 42.17A.615.

### **Exhibits**

- Exhibit 1 45-Day Citizen Action Complaint
- Exhibit 2 Response to Complaint
- Exhibit 3 Supplement to Response to Complaint
- Exhibit 4 SEIU 925 Contributions from PDC Database 8/13/13 – 8/13/15 (2 Year Period Covered by Complaint)
- Exhibit 5 SEIU 925 Contributions Reported on L-2 Reports 8/13/13 – 8/13/15 (2 Year Period Covered by Complaint)
- Exhibit 6 SEIU 925 Contributions from PDC Database 10/8/10 – 8/31/15 (5 Year Period Preceding October 8, 2015)
- Exhibit 7 SEIU 925 Contributions Reported on L-2 Reports 10/8/10 – 8/31/15 (5 Year Period Preceding October 8, 2015)