



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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Subject: PDC Case 141462 regarding Washington State Progressive Caucus

Dear Washington State Progressive Caucus:

The Public Disclosure Commission (PDC) has completed its review of the complaints filed by Glen Morgan and Conner Edwards on August 17, 2023 and August 2, 2024 respectively. The complaints alleged that Washington State Progressive Caucus, a Democratic political committee, may have violated RCW 42.17A.205, .235 and .240 by failing to timely update their *Committee Registration* (C-1pc report) to include current officers in 2023, and timely and accurately file *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) disclosing contributions and expenditures for election years 2018-2022.

Applicable Laws and Rules

- [RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report). The information disclosed on the C-1pc report includes, but is not limited to, the name, addresses, and titles of their officers or, if they have no officers, the names, addresses, and titles of their responsible leaders. Any material change to the information disclosed in the C-1pc report should be reported to the PDC within 10 days of the change.
- [WAC 390-05-245](#) defines a committee's officer to include any person designated by the committee as an officer on the C-1pc report and any person who makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee.
- A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity.

- Pursuant to RCW 42.17A.235(3)(a), each treasurer of a political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750<sup>1</sup>.
- Pursuant to RCW 42.17A.235(10), amended C-3 and C-4 reports should be submitted within 21 days of filing the original report. If there is no pending complaint about the report being amended and it meets the conditions set forth in .235(10)(a) through (d), it is not evidence of a violation to submit an amended report within 21 days of the original report.
- Per [RCW 42.17A.770](#), any action brought under Chapter 42.17A must be commenced within five years after the date the violation occurred.

### Background and Findings

- Washington State Progressive Caucus (the “Respondent”) is a Democratic political committee that first registered with the PDC in 2007.
- In their September 8, 2023 email response to the first complaint, the Respondent said their filing backlog was unintentional. The committee indicated they 1) ceased donating to campaigns in 2019; 2) refocused their mission on training, organizing and knowledge building; and 3) receive significantly less funding than they did 5-10 years ago, which is in the form of occasional low-dollar member donations. The Respondent stated their expenditures are confined to annual video conferencing tools and small processing fees for incoming donations. They acknowledged that their *Committee Registration* (C-1pc) report did not reflect their current Executive Board and indicated their intention to correct the report soon. The Respondent also acknowledged they had overdue reports to file and would work with the PDC’s Filer Assistance team to convert their data to the new online filing system (ORCA) so that they could amend their C-1pc report, quickly file all past-due reports, and stay current on their reporting requirements.
- On September 14, 2023, PDC staff assisted the Respondent committee in restoring access to their Online Reporting Campaign Activity (ORCA) accounts for 2019 and 2020.
- A Case Status Review (Initial Hearing) was held for this case on November 15, 2023. Justin Baird, the committee’s former Treasurer, attended the hearing remotely. He said it took him longer to review and respond to emails from PDC staff due to eye surgery, but he didn’t need special accommodation.
- Mr. Baird reached out to PDC staff by email or telephone a dozen times between March 25, 2024 and November 21, 2024 to provide status updates regarding missing and amended reports for 2020-2024. He worked closely with the PDC’s Filer Assistance team on several occasions to access, file and amend the committee’s reports to restore compliance. However, he stated that his efforts were frustrated by 1) multiple eye surgeries with recovery periods where he was required

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<sup>1</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

to remain immobile and other physical restrictions; 2) an overabundance of work hours and overtime that left him little time to work on reports; 3) two computer failures, one of which necessitated obtaining past bank statements and recreating committee records; 4) challenges reconciling contributions processed by ActBlue, which only appear as net dollar amounts minus a variable fee; 5) a slow or non-existent data connection inside his workplace; 5) illness in late July/early August of 2024; and 6) extensive storm damage to his home, a lengthy power outage, and multiple hospitalizations of his roommate in November of 2024.

- The committee's Chair, Jessica Soderman, sent an email to PDC staff on January 6, 2025 saying she and Mr. Baird had a plan in place to complete the remaining action items needed to restore compliance. Chair Soderman also said the committee would be submitting a request to change their reporting option from Full Reporting to Mini Reporting to simplify filings going forward. Mr. Baird worked with PDC staff on January 8, 2025 and completed some items.
- On February 28, 2025, PDC staff received an email from Chair Soderman notifying us that their Treasurer, Justin Baird, had passed away in late January.
- Chair Soderman emailed PDC staff on March 3, 2025 indicating they had appointed an interim Treasurer, Tim Noonan, and would be taking quick action to update their PDC accounts and access their bank and ActBlue accounts. She said they would continue working with our Filer Assistance team to complete the requested action items.
- Throughout our investigation, the Respondent worked closely with PDC staff to resolve the issues alleged in the complaint, was responsive to PDC requests, and demonstrated a willingness to research and obtain the information necessary to facilitate the filing and amendment of reports for 2019 through July of 2023. The Respondent also worked with PDC staff to ensure that reports for the latter half of 2023 through the present, although not alleged in the complaints, were also accurate. A summary of our findings is below.
- The Respondent does not have previous warnings/violations of PDC requirements.

#### Allegation: Inaccurate Committee Registration (2023)

- Prior to the first complaint being filed, the Respondent's most recent C-1pc report amendment was filed on February 11, 2020. On that C-1pc report, the committee selected the Full Reporting option and disclosed the following officers: Keoki Kauanoe, Chair; Justin Baird, Ministerial Treasurer; Riall Johnson, Western WA Vice Chair; Sarah Kennedy, Vice Chair-Eastern WA; Jessica Soderman, Tech Vice Chair; and Tiffany Kelly, Membership & Outreach.
- According to the committee's website, their Executive Board for 2023/2024 consisted of: Jessica Soderman, Chair; Justin Baird, Treasurer; Sharon Abreu, Secretary; Tim Noonan, Western WA Vice-Chair; Ryan Grant, Eastern WA Vice-Chair; Josh Sanders, At-Large Events & Fundraising; and Robin Leigh, At-Large PR & Social Media. At that time, two At-Large positions (Membership & Outreach and IT/Tech) were vacant.

- On May 15, 2024, the Respondent amended their C-1pc report to match the 2023/2024 Executive Board members displayed on their website. The committee has amended their C-1pc report four additional times since then, with the last amendment being filed on May 20, 2025.
- The most recent C-1pc report amendment filed by the Respondent discloses the same Chair, Treasurer, Secretary and Eastern WA Vice Chair Vice that were elected to serve as the committee's Executive Board for 2025/2026, as shown on their [website](#).
  - The committee's Chair (Jessica Soderman) assumed the Treasurer's role after Justin Baird passed away in late January of 2025.
  - Tim Noonan was elected to the position of Interim Treasurer of the Executive Board for 2025/2026 and is listed as Treasurer on the most recent C-1pc report amendment filed with the PDC.
- It is important to note that a committee determines who should be listed as an officer on their C-1pc report based on RCW 42.17A.205(2)(c) and the criteria set forth in WAC 390-05-245. These individuals may not always be the same as the committee's Executive Board or other individuals listed online, but the C-1pc report should include the committee's decision makers.

#### Allegation: Late and Missing Reports (2018 - 2023)

The complaint filed by Glen Morgan alleged the Respondent did not timely file 129 original and four amended C-3 and C-4 reports for August of 2018 through mid-June of 2020, and failed to file an unknown number of reports from mid-June through July of 2023.

To remedy non-compliance, the committee filed several late reports for 2020-2022 on July 31, 2024 and August 31, 2024, which prompted Conner Edwards to file a complaint alleging late reporting for those years.

#### Alleged Reports Outside Statute of Limitations (2018, 2019 & part of 2020)

All the reports listed below for 2018, 2019 and the first four months of 2020 fall outside the five-year statute of limitations for enforcement set forth in RCW 42.17A.770.

- Five C-4 reports for **2018** were filed 156-278 days late, including the committee's post-Primary report, and pre- and post-General reports. Minimal to no expenditure activity (less than \$14) was disclosed on all but one C-4 report, and the committee did not appear to participate in the 2018 Primary election. The late 21-day pre-General C-4 report disclosed 13 contributions made to candidates. Twenty-three C-3 reports for **2018** were filed 156-306 days late.
- Ten C-4 reports for **2019** were filed 17-142 days late, including the committee's pre- and post-election reports. Minimal to no expenditure activity (less than \$8) was disclosed on all but one C-4 report. The late 21-day pre-General C-4 report disclosed one \$150 contribution made to a candidate. All other candidate contributions for the 2019 Primary and General elections were disclosed timely on the December C-4 report, although two were later amended to show they

were made after the elections, in January of 2020 (see below). Fifty-three C-3 reports for **2019** were filed 15-143 days late.

- The four amended C-3 and C-4 reports for **2018** and **2019** that Mr. Morgan alleged were late were timely amended within 21 days of the original reports being filed.
- Four monthly C-4 reports for January-April of **2020** were filed 1,542-1,633 days late. Minimal expenditure activity (less than \$50) was disclosed on all but one report: The January C-4 report that was amended to show the two candidate contributions of \$150 each that were originally disclosed on the December 2019 C-4 report (see above). Thirty-three C-3 reports for January through April of **2020** were filed 2-309 days late.

#### Alleged Reports Inside Statute of Limitations (May 2020 - July 2023)

In **2020**, the committee received a total of \$5,706.57 in contributions, expended a total of \$561.36, and did not appear to participate in any elections.

- Eight monthly C-4 reports for May-December of **2020** were filed 1,297-1,502 days late. The reports disclosed minimal non-itemized expenditures ranging from less than \$3 to just over \$63, none of which appears to be election related.
- Forty-two C-3 reports for May-December of **2020** were filed 215-1,500 days late. Contributions were made by individuals and ranged from \$10 to \$210.

In **2021**, the committee received a total of \$3,328.50 in contributions, expended a total of \$1,679.93, and did not appear to participate in any elections.

- The committee submitted a C-4 report for January-December of **2021** containing information that was filed 1,179 days late. The report disclosed \$179.93 in non-itemized expenditures and a \$1,500 management/consulting fee that do not appear to be election related.
- Fifty-five C-3 reports for **2021** were filed 934-1,268 days late. Contributions were made by individuals and ranged from \$3.50 to \$100.

In **2022**, the committee received a total of \$2,478.00 in contributions, expended a total of \$141.04, and did not appear to participate in any elections.

- The committee submitted a C-4 report for January-December of **2022** containing information that was filed 814 days late. The report disclosed \$138.78 in non-itemized expenditures and \$2.26 in bank and payment processing fees that do not appear to be election related.
- Fifty-three C-3 reports for **2022** were filed 569-903 days late. Contributions were made by individuals and ranged from \$5 to \$100.

### Not Alleged: Late Reporting (August 2023 - April 2025)

In **2023**, the committee received a total of \$799.00 in contributions, expended a total of \$4,177.16, and did not appear to participate in any elections.

- The committee submitted a C-4 report for January-December of **2023** containing information that was filed 546 days late. The report disclosed \$73.66 in non-itemized expenditures and \$4,103.50 for office-related (computer) and operating (storage rental) expenses that do not appear to be election related.
- Thirty-nine C-3 reports for **2023** were filed 212-545 days late. Contributions were made by individuals and ranged from \$2 to \$50.

In **2024**, the committee received \$935 in contributions, expended \$6,216.97, and did not appear to participate in any elections.

- One monthly C-4 report for March of **2024** was filed 135 days late. The report disclosed a total of \$3.05 in bank and payment processing fees, and \$1,306.51 in operating expenses (utilities) that do not appear to be election related.
- One monthly C-4 report for October of **2024** was filed 57 days late. The report disclosed a total of \$2,990.17 in office (computer) and non-itemized expenditures that do not appear to be election related.
- Based on when the committee met the \$750 reporting threshold, four monthly C-4 reports for **2024** were submitted late: January and February reports were filed 127 days late, and August and September reports were filed 57 days late. The reports collectively disclosed a total of \$726.24 in office (computer, software) and \$17.89 in non-itemized expenditures, none of which appear to be election related. All other monthly reports were timely filed, based on received date or when the reporting threshold was met.
- Thirty-eight C-3 reports for **2024** were filed 29-185 days late. Contributions were made by individuals and ranged from \$2 to \$50.

To date, all C-3 and C-4 reports for **2025** have been timely filed.

### Summary and Resolution

There are several mitigating factors in this case, including the ongoing health issues and death of your committee's former Treasurer, and your lack of election participation in years 2020-2024. Despite the lateness of your committee's reports, the impact of noncompliance on the public was minimal because the financial activity was not election related. The committee's relatively small size, modest expenditures, and lack of sophistication are also mitigating factors.

It is further noted that the minimal nature of your committee's financial activity in 2022-2024 would have qualified you to select the Mini Reporting option<sup>1</sup> on your C-1pc report, thereby relieving you of the requirement to file C-3 and C-4 reports with the PDC for those years.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755. Furthermore, any allegations regarding reports covering activity for May, 2020 through April, 2025 that are not otherwise addressed herein are hereby dismissed.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your committee's failure to timely and accurately disclose all contributions and expenditures on C-3 and C-4 reports for years 2020-2024 and timely amend your C-1pc report to include officer changes. In the future, PDC staff expect you to 1) timely and accurately file all required reports of contributions and expenditures; and 2) update your *Political Committee Registration* (C-1pc report) within ten days of any material changes in accordance with PDC laws and rules. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff are also reminding you about the importance of timely amending C-3 and C-4 reports within 21 days of original reports, whenever possible. PDC staff expect that, in the future, you will timely disclose the above information in accordance with PDC laws and rules or guidance.

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

*Electronically signed by Tabatha Blacksmith*  
Tabatha Blacksmith  
Compliance Officer

Endorsed by,

*Electronically signed by Peter Frey Lavallee*  
Peter Frey Lavallee  
Executive Director

cc: Glen Morgan, Conner Edwards

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<sup>1</sup> A committee that raises and spends no more than \$7,000 and receives no more than \$500 from any single contributor can select the Mini Reporting option on their registration (C-1pc report), which relieves them of the requirement to file C-3 and C-4 reports with the PDC disclosing their contributions and expenditures. The \$7,000 limit was increased from \$5,000 effective April 1, 2023.