



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 25, 2025

Delivered electronically to ztannu@unitehere.org and sgershon@tristerross.com

Subject: PDC Case 164571 regarding UNITE HERE TIP State and Local Fund Sponsored by UNITE HERE International Union

UNITE HERE:

The Public Disclosure Commission (PDC) completed its review of the complaint filed Nov. 15, 2024 by Conner Edwards. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely report contributions and expenditures.

Applicable Laws and Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.240 requires committees to file accurate campaign finance reports with the Public Disclosure Commission.
- RCW 42.17A.250 describes the filing requirements for an out-of-state political committee organized for the purpose of supporting or opposing candidates or ballot propositions in another state that is not otherwise required to report under RCW 42.17A.205 through 42.17A.240.

Background and Findings

- The complaint alleged UNITE HERE TIP State and Local Fund Sponsored by UNITE HERE International Union (UNITE HERE) participated in the 2024 election by making expenditures supporting candidates and/or committees.
- Committees participating in the 2024 election were required to regularly file reports disclosing contributions and expenditures.
- In response to the complaint, Susan B. Gershon, legal counsel for UNITE HERE, stated UNITE HERE is a committee based in New York state and made only one expenditure in Washington state in 2024, a \$6,000 contribution to the Washington State Democratic Party.
- PDC staff noted this contribution was reported on a Summary Full Campaign Contributions and Expenditures (C-4) report timely filed Nov. 12, 2024.
- In response to the complaint, Gershon stated UNITE HERE relied on 2019 advice from the PDC to only report when the PAC had activity in Washington. PDC Filer Assistance staff verified they have provided advice that filers create a Washington PAC and report financial activity related to Washington.

- However, PDC staff notes UNITE HERE filed a C-4 that listed expenditures to out-of-state candidates; in the future, if filing as a Washington state PAC, the Committee must report all activity.
- UNITE HERE staff have stated they will be terminating the Washington PAC and report as an out-of-state committee moving forward.
- The complaint also alleged a discrepancy between reports UNITE HERE filed with the PDC in 2021 and 2024.
- UNITE HERE explained that it had no activity in Washington state “between December 1, 2021 and September 30, 2024,” and Gershon stated that “the difference between the two aris[es] out of contributions and expenditures outside of Washington State that were not reported because the Committee was not subject to Washington State reporting obligation during the period”

Summary and Resolution

Pursuant to WAC 390-37-060(1)(d), this letter constitutes a formal written warning concerning the failure to disclose all contribution and expenditures. PDC staff expects UNITE HERE to report all contributions and expenditures in the future if filing as a Washington state PAC. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, contact Alice Fiman, Compliance Officer at 1-877-601-2828 or by e-mail at fdc@fdc.wa.gov.

Sincerely,

Endorsed by,

/s Electronically signed Alice Fiman

Alice Fiman
Compliance Officer

/s Electronically signed Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Conner Edwards