



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 12, 2025

Delivered electronically to Whitney Wenzel on behalf WA Public Employees Association

UFCW Local 365 PAC at whitney@wpea.org

Subject: PDC Case 170130 WA Public Employees Association/UFCW Local 365 PAC

WA Public Employees Association/UFCW Local 365 PAC:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on April 4, 2025. The complaint alleged violations of RCW 42.17A.235 and .240 for failing to file timely and accurate expenditure reports and lack of proper description/details related to the staff time for in-kind contribution(s) received by the Respondent.

Applicable Laws and Rules

- [RCW 42.17A.235](#) requires each treasurer of a candidate or political committee, or an incidental committee, to file with commission a report of all contributions received and expenditures made on the next reporting date pursuant to the timeline established in the statute.
- [RCW 42.17A.240](#) requires each treasurer of a candidate or political committee, or an incidental committee, to file with the commission a report including/depicting the contributor's occupation and the employer's name and address.

Background and Findings

- The complaint alleged that WA Public Employees Association UFCW Local 365 (The Committee), a continuing committee in the 2025 election year, failed to timely and accurately file contributions and expenditure (C-4) reports.
- Staff noted that The Committee failed to timely file the February 2025 C-4 report that was due on March 10, 2025. The report was required to be filed no later than March 10, 2025, and was filed 25 days late on April 3, 2025. The same applies to the March 2025 C-4 report that was due no later than April 10, 2025. This report was filed 3 days late on April 14, 2025.

- Staff also noted that The Committee should have provided a more detailed description/detail of the services provided by the employees to include their names and services rendered/provided for in-kind contributions received for “wages, benefits and overhead.”
- In the response to the complaint received on May 17, 2025, The Committee, by way of Whitney Wenzel, stated: “While I cannot deny that the reports were submitted late to which we in the past have had an impeccable history of our reports being submitted on time, I also do believe they were filled accurately to the best of my knowledge and understanding of the PDC guidelines. As a union we are required to report the time our staff is paid for their time rendered.”
- On August 8 and 11, 2025, The Committee amended its C-4 reports to include better/adequate description of the in-kind contributions associated with the contributions for “wages, benefits and overhead” noted on The Committee C-4 reports to include the names of the employees and services provided in the description field.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, the failure to timely and accurately file the required C-4 reports does not amount to a violation that warrants further investigation.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, the Committee is receiving a formal written warning concerning the failure to timely and accurately file some of The Committee’s C-4 reports to include expenditure detail/description for the in-kind contribution received by The Committee. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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

If you have questions, you may contact Erick O. Agina, Compliance Officer, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Erick O. Agina
Erick O. Agina
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Conner Edwards