



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 18, 2025

Delivered electronically to nora@palattaoburnes.com

Subject: PDC Case 172945 regarding Palattao Burnes Strategies

Palattao Burnes Strategies:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on April 29, 2025. The complaint alleged violations of RCW 42.17A.615 for failure to timely disclose lobbyist activities on L2 reports.

Applicable Laws and Rules

[RCW 42.17A.615](#) requires each registered lobbyist to electronically file *Lobbyist Monthly Expenditure Reports* (L-2 reports) with the PDC disclosing their lobbying activities, which are due within 15 days of the end of each calendar month to be reported. The monthly report shall include, but not be limited to, 1) the subject matter of proposed legislation or other legislative activity or rule making under chapter 34.05 RCW; and 2) the state agency considering the subject matter that the lobbyist has been engaged in supporting or opposing during the reporting period. Exemptions are listed under [RCW 42.17A.610](#).

Background and Findings

- The Respondent filed 6 original L-2 reports during calendar year 2024 after the due date.
- The Respondent filed 6 original L-2 reports timely during calendar year 2024.
- The Respondent filed timely original L-2 reports during the calendar year 2025.
- The Respondent does not have previous warnings/violations with PDC within the last five years.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purpose of this chapter. Under WAC 390-37-060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent

is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted. The failure to timely file monthly L-2 reports does not amount to a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to timely and accurately disclosure of all expenses, income and activity. PDC staff expects that you will timely and accurately file all future required reports of expenses, income and activity. The Commission will consider the 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 Tabitha Townsend at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed by Tabitha Townsend

Tabitha Townsend
Compliance Officer

Electronically signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Conner Edwards