



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 22, 2025

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Subject: PDC Case 174306 Progress Alliance of Washington

Progress Alliance of Washington:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on June 11, 2025.

The complaint alleged that Progress Alliance of Washington (Washington Progress Alliance or WPA) may be an unregistered political committee based on the definitions of "Political Committee" and "Person" in [RCW 42.17A.005\(41\) and \(39\)](#), respectively, and on the "Primary Purpose Test" in the Commission's [Interpretation 07-02](#).

Applicable Laws and Rules

RCW 42.17A.005(41) states, "Political committee" means any person (except a candidate or an individual dealing with the candidate's or individual's 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.

RCW 42.17A.005(39) states, "Person" includes an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized.

RCW 42.17A.205 requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report) within two weeks of organization or the date it first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. Any material change to the information disclosed on the C-1pc report should be reported to the PDC within 10 days of the change.

RCW 42.17A.235 and .240 - A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and 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.

Interpretation 07-02 is the Commission's Primary Purpose test to determine whether an entity is a political committee based on whether one of its primary purposes is to affect governmental decision-making by supporting or opposing candidates or ballot propositions.

Background and Findings

- According to its website, Washington Progress Alliance includes: "Washington Progress Fund, a 501(c)(3) charitable organization that invests in non-partisan civic engagement and leadership development; and Washington Progress Alliance, a 501(c)(4) social welfare organization, that invests in movement building, issue advocacy, and political engagement."
- During the period 2010-2025, candidates and political committees reported receiving contributions from Washington Progress Alliance totaling \$490,457.53. However, contributions reported by recipients as received from 2020 to 2025 totaled \$42,918.98 and of that amount, three contributions totaling \$35,000 were misreported by recipients as coming from Progress Alliance of Washington when they were actually expenditures made and reported by Voter Action, the political committee established by WPA in 2018.
- After removing the \$35,000 in misreported contributions, candidates and political committees properly reported receiving contributions from Progress Alliance of Washington from 2020 - 2025 totaling \$7,918.98 which included a \$4,100 contribution to Citizens in Support of Yelm Community Schools (Citizens for Yelm) on April 21, 2025 and \$3,818.98 in small in-kind contributions to various candidates on 28 occasions.
- Progress Alliance of Washington stated it does not solicit, accept, or have an expectation of receiving contributions for the purpose supporting candidates or ballot propositions in election campaigns.

Application of PDC Interpretation 07-02 (Primary Purpose Test) to Progress Alliance of Washington

- The Primary Purpose test looks at: (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 and mission.
- Staff also considers whether an organization spends more than 30 percent of its budget supporting candidates or ballot propositions in election campaigns.
- Between 2020 and 2025, election-related expenditures for WPA totaled \$7,918.98, less than one percent of its \$5,267,310 operating budget during that same period.
- The vast majority of WPA's expenditures are for grants and donations to other non-profit organizations. Progress Alliance of Washington does not have election financing as one of its primary purposes.
- Staff also asked Progress Alliance of Washington about the First Mile Circle program described on its website and found that WPA does not solicit or accept donations for the First Mile Circle program. Rather, WPA selects potential candidates and connects them with potential donors.

WPA staff communicates with donors but not with the candidates, WPA does not accept contributions on behalf of candidates and does not provide any monetary contributions to candidates through its First Mile program.

Summary and Resolution

Progress Alliance of Washington stated it does not solicit, accept, or have an expectation of receiving contributions for the purpose supporting candidates or ballot propositions in election campaigns. The vast majority of WPA's expenditures are for grants, and donations to other non-profit organizations. Progress Alliance of Washington does not have election financing as one of its primary purposes.

There is no evidence to support a finding that Progress Alliance of Washington is required to register and report as a political committee.

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

If you have questions, you may contact Phil Stutzman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed by Phil Stutzman
Phil Stutzman
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford
Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Conner Edwards