



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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November 4, 2025

Delivered electronically to hann@seiu1199nw.org

Subject: PDC Case 174718 regarding SEIU HealthCare 1199 NW PAC

SEIU HealthCare 1199 NW PAC:

The Public Disclosure Commission (PDC) completed its review of the complaint filed June 11, 2025, by Conner Edwards. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely report contributions, specifically failing to report an in-kind contribution for legal services related to a PDC action.

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 file accurate campaign finance reports with the Public Disclosure Commission.

Background and Findings

- On May 27, 2025, the Commission agreed to a stipulation between PDC staff and SEIU HealthCare 1199 NW PAC.
- SEIU Healthcare 1199NW provided legal services to SEIU HealthCare 1199 NW PAC during the investigation that resulted in the stipulation.
- On its Lobbyist Monthly Political Contribution Report (L-3c) report filed covering May 2025, SEIU HealthCare 1199 NW reported an in-kind contribution of \$1,054.13 for staff time to SEIU Healthcare 1199NW PAC. In response to a request by PDC staff, SEIU HealthCare 1199 NW amended the report to identify the legal services portion of the staff time.
- In response to a request by PDC staff, SEIU Healthcare 1199NW PAC filed a Campaign Summary Receipts and Expenditures (C-4) report Oct. 23, 2025, to list the in-kind contribution SEIU HealthCare 1199 NW for legal services.
- SEIU HealthCare 1199 NW PAC timely filed the C-4 report that listed the penalty paid in PDC case 163092.

- The in-kind contribution was timely reported by SEIU HealthCare 1199 NW and did not include work that supported or opposed candidates or issues on the Primary or General Election ballots.

Summary and Resolution

In this instance, the failure to timely file a C-4 report to disclose in-kind contributions for legal services does not amount to a violation that warrants further investigation.

After consideration of all the circumstances, further proceedings would not serve the purposes of the Fair Campaign Practices Act. Under WAC 390-37-070, 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 executive director must report at each regular Commission meeting all complaints dismissed.

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 at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed by Alice Fiman
Alice Fiman
Compliance Manager

Endorsed by,

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

cc: Conner Edwards