



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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October 13, 2025

Delivered electronically to [paul.l.charbonneau@gmail.com](mailto:paul.l.charbonneau@gmail.com) , [sharchar@hotmail.com](mailto:sharchar@hotmail.com) and [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: PDC Case 174928 regarding Paul Charbonneau

Dear Paul Charbonneau:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on July 2, 2025. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures in election year 2025, specifically an in-kind contribution and expenditure descriptions.

Applicable Laws and Rules

- Candidates are required to register with the PDC by filing a *Candidate Registration* (C-1 report). A candidate that selects the Full Reporting option on their C-1 report is required to disclose 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 candidate's election participation, and their financial activity. From early June through early November, C-3 reports are due weekly, instead of monthly, and candidate committees that are participating in an election are subject to an accelerated reporting schedule that includes pre- and post-election C-4 reports, regardless of financial activity.
- A candidate committee may file monthly C-4 reports, due by the 10th day of the following month, for those months during which they are not participating in an election. The committee may delay the filing of these monthly reports until they have either received contributions or made expenditures that exceed \$750<sup>1</sup> since the last such report filed. RCW 42.17A.235(3(a) and [WAC 390-05-400](#).

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<sup>1</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

- Pursuant to RCW 42.17A.240(7), a candidate’s C-4 report should disclose, but is not limited to, the name and address of each person<sup>2</sup> to whom an expenditure was made in the aggregate amount of more than \$200<sup>3</sup> during the period covered by the report, as well as the amount, date, and purpose of each expenditure. Expenditure details should include, but are not limited to, the name and address of the vendor or recipient, the goods or services provided, including the number of items purchased. Per [WAC 390-16-037\(2\)](#), the purpose description for some expenditures may require additional disclosures. An in-kind contribution is disclosed as an expenditure for purposes of campaign accounting and reporting.
- Per [RCW 42.17A.235\(10\)](#), if there is no pending complaint about a C-3 or C-4 report being amended and it meets the conditions set forth in .235(10)(a) through (d), it is not evidence of a violation to submit an amended report within 21 days of the original report.

### Background and Findings

- Paul Charbonneau (the “Respondent”) is a 2025 candidate for the position of City Council Member for the City of Newcastle. The Respondent registered with the PDC as a 2025 candidate on November 21, 2024, and selected the Full Reporting option on his C-1 report. The Respondent advanced to the 2025 General Election and did not participate in the Primary Election. He is an incumbent and currently holds the position sought.
- In his July 9, 2025 written response to the complaint allegations, the Respondent apologized and indicated that human error and a misunderstanding led to the reporting issues cited in the complaint. He indicated his belief that his campaign had amended reports as requested by PDC staff. The Respondent said he would 1) work with his Treasurer to file reports in a timely manner and provide more expenditure details moving forward; and 2) be sure to reach out to PDC staff for assistance if needed. The Respondent also stated his campaign is committed to transparency and working diligently to ensure all information is fully reported, including in-kind contributions.
- The campaign was cooperative throughout our assessment of the complaint, and the Respondent took corrective action as needed.
- The Respondent does not have any previous warnings or violations of PDC requirements.

### Alleged: Late Reporting (Election Year 2025)

- The candidate committee filed a zero-dollar monthly report for November 2024 that was not late because they did not meet the reporting threshold.

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<sup>2</sup> “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.005\(39\)](#).

<sup>3</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- The original C-4 report for December 2024 - March 2025 was filed 73 days late based on when the reporting threshold was met. The report was later amended to include an in-kind contribution that was disclosed 154 days late. The original and amended reports were filed prior to the General Election.
- April activity on the original C-4 report for April - May 2025 was disclosed 4 days late, based on when the reporting threshold was met, and original May activity<sup>4</sup> was timely disclosed. The report was later amended to include additional expenditures and an in-kind contribution for May that were disclosed 3 days late. The original and amended reports were filed prior to the General Election.
- The committee's monthly C-4 reports for June, July and August were timely filed.
- All the campaign's C-3 reports for deposits made 12/2/24 through 10/6/25 were timely filed.

#### Allegation: Insufficient In-Kind Contribution Details

The complaint alleged the quantity of signs received for an in-kind contribution from Capitol City Press, dated 12/1/24 and valued at \$1,200, was omitted from the Respondent's C-4 report covering 12/1/24 - 3/31/25.

- The Respondent amended the candidate committee's Dec.-Mar. 2025 C-4 report on 7/9/25 to include the number of yard signs received from Capitol City Press.

#### Allegation: Insufficient Expenditure Descriptions

The complaint alleged insufficient expenditure description details on C-4 reports, specifically entries for Northwest Passages Consulting, which allegedly did not include the quantity of items and sub-vendor breakdowns (where applicable).

- On July 9, 2025, the candidate committee amended their C-4 report for December 2024 - March 2025 to correct the description for Northwest Passage Consulting to reflect that it did not include printed items that need to be quantified on reports.
- On July 9, 2025, the campaign amended their April/May C-4 report to include the number of Re-Elect stickers purchased from Northwest Passage Consulting. The Respondent confirmed that no sub-vendor was used.
- On July 10, 2025, the Respondent amended the expenditure description on his June C-4 report for Northwest Passage Consulting to include sub-vendor details for Overnight Printing.

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<sup>4</sup> May activity included a \$60 candidate filing fee, paid to the Secretary of State on 5/5/25, disclosed under non-itemized expenditures.

Summary and Resolution

Noncompliance appears to be the result of good-faith errors and omissions, which are mitigating. Your late reporting is further mitigated by 1) the relatively modest expenditures involved; 2) the relatively small and unsophisticated nature of your campaign; and 3) the fact that reports were filed or amended well in advance of the 2025 General Election.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely and accurately disclose all contribution and expenditures for election year 2025. PDC staff expect you to timely and accurately file all required reports in the future. 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, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

*Electronically signed by Tabatha Blacksmith*  
Tabatha Blacksmith  
Compliance Officer

Endorsed by,

*Electronically signed by Peter Frey Lavallee*  
Peter Frey Lavallee  
Executive Director

cc: Conner Edwards