



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 8, 2025

Delivered electronically to will.chen@willchencpa.com , chong.michaellee@gmail.com and cg.edwards53@gmail.com

Subject: PDC Case 175528 regarding Will Chen

Dear Will Chen:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on July 1, 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 the C-4 report for May and the C-3 report dated 5/6/25. The complaint also alleged that some expenditure descriptions on C-4 reports and contributor details on C-3 reports were insufficient.

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. 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 \$750¹ since the last such report filed. RCW 42.17A.235(3(a) and [WAC 390-05-400](#).

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

- A candidate’s C-3 report should disclose, but is not limited to, the name and address of each person² that contributed more than \$100³ in the aggregate, and the amount contributed. When their aggregate contributions exceed \$250, the person’s occupation, employer name and location (city and state) are also required. RCW 42.17A.235(5), .240(2)(c) and [WAC 390-16-034](#).
- 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 to whom an expenditure was made in the aggregate amount of more than \$200⁴ during the period covered by the report, as well as the amount, date, and purpose of each expenditure. Per [WAC 390-16-037\(2\)](#), the purpose description for some expenditures may require additional disclosure (e.g. number of brochures printed).

Background and Findings

- Will Chen (the “Respondent”) is a 2025 candidate for the position of City Council Member for the City of Edmonds. The Respondent registered with the PDC as a 2025 candidate on January 8, 2025 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 8, 2025 written response to the complaint, the Respondent thanked PDC staff for reaching out and said that his campaign’s \$872.94 expenditure to Service Printing Co. was for 500 literature handouts and 30 campaign signs. He also indicated their intention to amend reports to include required details for contributor Albright.
- 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 campaign’s monthly C-4 reports for April, May, June and August were filed 43, 14, 1 and 2 days late respectively.
- Monthly C-4 reports for January, February, March and July, and the 21-day pre-General C-4 report (covering 9/1 – 10/13) were timely filed.

² “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\(39\)](#).

³ Per [WAC 390-05-400](#), this dollar amount increased from \$25 to \$100 effective April 1, 2023.

⁴ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- C-3 reports for deposits dated 5/6/25 and 6/23/25 were filed 14 and 11 days late respectively.
- All other C-3 reports for deposits dated 1/15/25 through 4/30/25 and 10/3/25 were timely filed.

Allegation: Insufficient Expenditure Descriptions

- The candidate committee amended two descriptions on their March C-4 report on October 5, 2025 to include the number of yard signs and kickoff brochures purchased from The Branding Iron LLC on 3/10/25 and 3/27/25 for \$402.66 and \$152.16 respectively.
- On July 9, 2025, the Respondent amended a description on their April C-4 report to add yard signs and include the number of campaign handouts and signs purchased from Service Printing Co Inc on 4/8/25 for \$872.94.

Allegation: Insufficient Contributor Details

- The original C-3 report dated 5/6/25 filed by the Respondent's campaign lacked contributor address, occupation, employer name and location for three entries. The Respondent amended the C-3 report on 7/9/25 to include the missing contributor details.

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 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. 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.

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