



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 8, 2025

Delivered electronically to donschwabforeverett@gmail.com, schwabforcouncil@gmail.com and cg.edwards53@gmail.com

Subject: PDC Case 175421 regarding Don Schwab

Dear Don Schwab:

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, .240 and .320 for failure to timely and accurately report contributions and expenditures, specifically the May C-4 report for 2025, and failure to provide complete sponsor identification (ID) on a candidate website.

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.
- 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](#).
- Political advertising as defined in [RCW 42.17A.005\(40\)](#) includes, but is not limited to, mass communication. Mass communication as defined in [WAC 390-05-290](#) includes, but is not limited to, internet websites.

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

- Pursuant to [RCW 42.17A.320](#), all written political advertising must include the name and address of the sponsor. Sponsor identification should appear on the first page or fold of the political advertising, in at least ten-point type, and be set apart from any other printed matter.
- [WAC 390-18-010](#) indicates that all political advertising must clearly state that it has been paid for by the sponsor². Additional disclosures may be required, depending on the sponsor and type of advertising used and [WAC 390-18-030](#) contains additional information regarding sponsor identification requirements and exemptions for political advertising, and alternatives for online advertising.

Background and Findings

- Don Schwab (the “Respondent”) is a 2025 candidate for the position of City Council Member for the City of Everett. The Respondent registered with the PDC as a 2025 candidate on January 23, 2022, 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 written response to the complaint, dated July 13, 2025, the Respondent said his C-3 and C-4 reports for May were filed late but prior to being notified. He indicated his Treasurer experienced some difficulties reporting contribution deposits and sought assistance from PDC staff. The Treasurer erroneously thought the reports had been timely filed, an oversight that was later corrected. The Respondent said 1) the campaign’s May C-4 report had been corrected to disclose his candidate filing fee; and 2) his campaign photo and related material were updated to include full sponsor ID.
- On July 21, 2025, the campaign’s Treasurer reached out to PDC staff by telephone and said they discovered an unreported website expenditure incurred earlier in the year with the campaign’s credit card and would amend their monthly C-4 report for February 2025 to disclose this information. The Respondent also followed up via email.
- 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 monthly C-4 report for February 2025 was timely filed but amended on July 22, 2025 to disclose a \$69.06 website-related expenditure.

² For the purposes of political advertising, the “sponsor” is the person who paid for the advertising. If a person acts as an agent or is reimbursed for the payment, the original source of the payment is the sponsor.

- The monthly C-4 report for May 2025 was filed 14 days late and amended 16 days later to disclose the Respondent’s candidate filing fee.
- Six C-3 reports for deposits made 5/1/25 through 8/1/25 were filed 3-32 days late.
- All other C-4 reports covering activity through August of 2025 were filed timely or not late because the threshold to file monthly reports was not met. All other C-3 reports for deposits through 9/22/25 were timely filed.

Allegation: Incomplete Sponsor ID

- The Respondent updated his candidate website at www.schwabforcouncil.com to include the missing “Paid for by” phrase on or about July 13, 2025. The sponsor’s name and address were already present on the candidate’s Donate page. The full sponsor ID statement was also added to the home page.

Summary and Resolution

Your noncompliance appears to be the result of good-faith errors or omissions, which are mitigating. 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. Similarly, while your campaign website did not initially contain all of the required information, the public would have been able to ascertain basic sponsor information before the site was updated to include complete sponsor ID.

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 and provide complete sponsor ID on your website. Staff expect you to timely and accurately file all required reports and include complete sponsor ID on all political advertising 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