



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 8, 2025

Delivered electronically to kdharless@gmail.com

Subject: PDC Case 175934

Kim Harless:

The Public Disclosure Commission (PDC) completed its review of the complaint filed July 11, 2025 by Conner Edwards. The complaint alleged violations of RCW 42.17A.235 for failure to timely disclose contributions and expenditures on Cash Receipts Monetary Contributions (C-3) reports and RCW 42.17A.320 by failing to include proper sponsor identification on political advertising, specifically failure to include complete sponsor identification on a campaign website.

Applicable Laws & Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.320 requires that all political advertising supporting or opposing a candidate or ballot proposition include the sponsor's name and address. A candidate or candidate committee sponsoring advertising about the committee must use the words "paid for by" or "sponsored by" followed by the name of the candidate committee.

Background & Findings

- Kim Harless is a 2025 Candidate for Vancouver City Council. Harless was elected to the same position in 2021.
- The complaint noted Harless's website lacked complete sponsor identification. In response, Harless noted this was an oversight by a website designer and both web pages noted in the complaint are now updated with full sponsor identification.
- The complaint also noted Harless filed three C-3 reports 14 days late, and that Harless was reminded by the PDC in June regarding late C-3 and C-4 reports.
- Harless responded stating the campaign filed all C-4 reports timely, but the previous PDC case did find one late C-3 report from March.
- Harless agreed there were three C-3 reports filed 14 days late, as noted in the current complaint, but said those "were completed and filed prior to this complaint, so there is no corrective action to take." In the response, Harless also stated: "The circumstance that led to those deposits being

late was that the switch to depositing C3s weekly had not been entered correctly into the treasurer's calendar, and so was caught when they were preparing the C4 for the June 1 - July 14 period.”

- Harless participated in the 2025 Primary Election, and advanced to the 2025 General Election.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purpose of this chapter. Under WAC 390-37-060, 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.

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

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning the requirement to timely file C-3 reports and also to include complete sponsor identification on political advertising. PDC staff expect you to timely file C-3 reports and include complete sponsor identification 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.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed by Alice Fiman

Alice Fiman
Compliance Manager

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Conner Edwards