



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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October 1, 2025

Delivered electronically to [grace.yuan@klgates.com](mailto:grace.yuan@klgates.com)

Subject: PDC Case 176403 regarding K&L Gates Continuing PAC

K&L Gates Continuing PAC:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on July 1, 2025, and July 18, 2025. The complaints alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures.

Applicable Laws and Rules

Pursuant to [RCW 42.17A.235\(3\)\(a\)](#), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750.

Pursuant to [RCW 42.17A.240\(2\)](#), monetary contributions are disclosed on C-3 reports, which must include, but are not limited to: 1) the name and address of each person who contributed more than \$100 during the period covered by the report; 2) the monetary value and date of each contribution, except for the items specifically mentioned in subsection (2)(a) through (g); and 3) the aggregate value of all contributions received from each person during the campaign. "Contribution," as defined, includes an in-kind contribution, which is disclosed on a C-4 report.

Background and Findings

- The Respondent filed C-4 reports from no days late up to 10 days late during the time-period of January 2025 through the Primary Election 2025 held on August 5, 2025.
- The Respondent filed five (5) C-3 reports between on time and up to 14 days late.
- Included in the late C-4 reports were four (4) zero-dollar reports.
- The Respondent does not have previous warnings/violations of PDC filing requirements.

## 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. The failure to timely and accurately file the C-3 and C-4 reports covering election year 2025 for the Primary election does not amount to a violation that warrants further investigation in this instance.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to timely and accurately disclosure of all contribution and expenditure details. PDC staff's expectation is that you timely and accurately file all future required reports of contributions and expenditures. 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, contact Tabitha Townsend at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Electronically signed by Tabitha Townsend  
Tabitha Townsend  
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavalley  
Peter Frey Lavalley  
Executive Director

cc: Conner Edwards