

Respondent Name

United Food and Commercial Workers Local 367, Washington Community Action Network, Oly Rising

Complainant Name

Amalie O'Connor and Cheryl Selby

Complaint Description

[Amalie O'Connor](#) reported via the portal
(Thu, 30 Oct 2025 at 3:50 PM)

Failure to Disclose Campaign Expenditure in a Timely Manner

Violation: UFCW Local 367 PAC made a payment of \$227,142 to Washington Community Action Network (WA CAN) on January 28, 2025, for “Voter signature/petition gathering costs” related to Olympia’s Proposition 1.

Issue: Under RCW 42.17A.005(37) and WAC 390-05-210, any expenditure to support or oppose a ballot measure—including signature gathering—must be disclosed promptly. This payment was not disclosed to the PDC until July 22, 2025, almost six months after it was made.

Impact: The delay in reporting undermines the principle of transparency in campaign finance and prevents voters from knowing about significant campaign expenditures during the signature-gathering process.

Campaign Activity by Nonprofit (WA CAN) without Proper Disclosure

Violation: WA CAN is a 501(c)(4) social welfare nonprofit, which, while allowed to engage in issue advocacy, cannot primarily engage in campaign activity. The payment from UFCW to WA CAN appears to have been used for petition gathering, a direct campaign activity.

Issue: If WA CAN’s primary purpose in this case was to facilitate petition gathering for Olympia’s Proposition 1, this may violate the restrictions on 501(c)(4) nonprofits engaging in political campaigns. Such an activity could trigger additional reporting requirements that were not fulfilled.

Impact: Nonprofit entities like WA CAN must limit campaign activities and disclose any related expenditures as required by law. Failure to do so may be considered a violation of IRS rules regarding 501(c)(4) organizations.

Potential Dark Money Flow through Nonprofit

Violation: The UFCW PAC paid WA CAN for signature gathering, but the payment was not properly reported until months after the fact, raising concerns about dark money—political spending hidden from public view until after it has already influenced the campaign process.

Issue: Although the money was disclosed, the late reporting and use of a 501(c)(4) nonprofit as an intermediary could conceal the influence of PACs or donors, making it difficult for voters to track who is funding and controlling political campaigns.

Impact: Late or opaque reporting of campaign expenditures undermines the public’s ability to follow the money and prevents meaningful voter scrutiny during the critical stages of a ballot initiative campaign.

Lack of Transparency in the Signature-Gathering Process

Violation: The six-month delay in reporting the expenditure raises questions about whether the public had access to timely information regarding the funding of signature-gathering activities.

Issue: During this six-month window, the Prop 1 campaign gathered signatures in Olympia, potentially allowing significant influence from outside entities to go unnoticed.

Impact: This delay in disclosure limits voters’ ability to assess whether special interests are influencing a local measure before the measure qualifies for the ballot, depriving the public of their right to assess the full scope of financial influence.

Request for Investigation:

Primary Request: Investigate whether the UFCW PAC’s payment to WA CAN violated campaign finance disclosure laws, particularly regarding timely reporting and adequate disclosure of funds used for signature-gathering activities for Olympia’s Proposition 1.

Secondary Request: Investigate whether WA CAN, as a 501(c)(4) nonprofit, violated IRS restrictions by primarily engaging in campaign activity and not following proper disclosure protocols for political expenditures.

Additional Inquiry: Consider whether the use of WA CAN for signature gathering constitutes a form of dark money and whether the delayed reporting undermined transparency in the Prop 1 campaign process.

What impact does the alleged violation(s) have on the public?

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List of attached evidence or contact information where evidence may be found

PDC Website,
Olympia City Council Meeting Minutes re: proposition 1 signature gathering,
Thurston County Auditor re: certification of signatures for the initiative

List of potential witnesses with contact information to reach them

UFCW 367 253 589-0367
WA Can washingtoncan.org

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.