



State of Washington
PUBLIC DISCLOSURE COMMISSION

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November 20, 2025

Delivered electronically to molly@ilwulocal19.org

Subject: PDC Case 176605 regarding ILWU 19 PAC

ILWU 19 PAC:

The Public Disclosure Commission (PDC) completed its review of the complaints filed July 18 and Sept. 1, 2025 by Conner Edwards. The complaints alleged violations of RCW 42.17A.235 and .240 by failing to timely disclose expenditures on Summary Expenditure (C-4) Reports and contributions on Monetary Contribution (C-3) Reports.

Applicable Laws and Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.240 describes the required contents of campaign finance reports filed with the Public Disclosure Commission.

Background and Findings

- ILWU 19 PAC (Sponsored by ILWU Local 19) (the Committee) is a Continuing Committee, registered with the PDC under the Full Reporting option.
- The Committee participated in the 2025 Primary Election, listing monetary contributions beginning March 21, 2025 to registered candidates.
- As a PAC participating in the 2025 Primary Election, the Committee was required to file a 21-day pre-primary C-4 on July 15, 2025 listing expenditures and contributions covering July 1 – 14 and a 7-day pre-primary C-4 on July 29, 2025 listing expenditures and contributions covering July 15 – 28.
- The Committee instead filed monthly reports covering July (filed Aug. 27, 2025) and August (filed Oct. 10, 2025). These reports were filed 22 days and 66 days after the 2025 Primary Election.
- Working with PDC staff, the Committee updated its PDC financial reporting program to report as participating in the election and filed its 21-day and 7-day pre-general C-4 reports timely.
- As noted in the complaint, the Committee received a \$10,000 contribution from its sponsor on June 6, 2025, but failed to report the contribution until Aug. 27, 2025, 22 days after the 2025 Primary Election.

- In total, the Committee made \$4,650 in contributions to PACs and Candidates during the 2025 election.
- The Committee has no prior PDC enforcement action.

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 purposes 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.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning the failure to timely disclosure of all contribution and expenditures. PDC staff expects the PAC to timely 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 Alice Fiman at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Alice Fiman
Alice Fiman
Compliance Manager

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Conner Edwards