



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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November 3, 2025

Delivered electronically to mayhays047@gmail.com, ajhill2010@gmail.com, cushman08@yahoo.com and cg.edwards53@gmail.com

Subject: PDC Case 176757 regarding Merrilee (May) Hays

Dear May Hays:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by David Fetto and Conner Edwards on July 18, 2025 and August 7, 2025. The first complaint alleged that May Hays (the “Respondent”) violated RCW 42.17A.320 by failing to include sponsor identification (ID) on political advertising, specifically signs and banners. The second complaint alleged that the Respondent violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions, based on 1) a late C-3 report, dated 5/31/25, that was filed 55 days late; and 2) a discrepancy between the ending balance for the candidate’s 2021 campaign and beginning balance for her 2025 campaign and a late C-3 report.

Applicable Laws and Rules

- [RCW 42.17A.205](#) requires a candidate to register with the PDC by filing a *Candidate Registration* (C-1 report). A candidate committee 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.
 - From early June through early November, C-3 reports are due weekly, instead of monthly, if a candidate is participating in the General Election, regardless of financial activity.
 - Candidate committees participating in an election are subject to an accelerated reporting schedule that includes pre- and post-election C-4 reports, regardless of 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](#).

- Pursuant to [RCW 42.17A.320](#), all written political advertising² must include the name and address of the sponsor³. Sponsor identification should appear on the first page or fold of the political advertising, be set apart from any other printed matter, and the font size used must be at least the larger of the following: 1) ten percent of the largest type used in the advertisement; or 2) ten-point type.
- [WAC 390-18-010\(2\)](#) states “all advertising must clearly state...that it has been paid for by the sponsor.”

Background and Findings

- The Respondent is a 2025 candidate for the position of Mayor for the City of West Richland who registered with the PDC on May 15, 2025 and selected the Full Reporting option on her C-1 report. The Respondent advanced to the 2025 General Election and did not participate in the Primary Election. She currently holds the position of City Council Member for the City of West Richland.
- On August 12, 2025, the Respondent provided a response to the first complaint saying stickers had been developed and were being applied to campaign signs. She included a photo of a sign with a sticker attached, which included the required “Paid for by” and her name and address. The Respondent said the signs/banners order was still in the process of being fulfilled and the campaign had not yet received any invoices but would report this information on a future C-4 report. The campaign amended its June C-4 report two days later to include an estimated cost for its signs and banners.
- While assessing the complaints, PDC staff deduced that a ministerial error in the campaign’s start date was preventing a 5/9/25 deposit and other entries dated earlier than 5/15/25 from appearing on their May C-4 report. This good-faith error gave the false appearance that the committee’s beginning balance for 2025 did not match their ending balance from 2021. The Respondent committee amended their May C-4 report on August 14, 2025 to correct their campaign start date to 5/8/25, which resolved the issue.

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

² Political advertising” is a mass communication used to appeal, directly or indirectly, for votes, financial or other support, or opposition to any election campaign that is intended to reach a large audience via a variety of methods. These methods include, but are not limited to, newspaper, radio and TV advertising, signs, billboards, brochures, fliers, and digital communications and online transmissions such as internet websites, social media, emails, and texts. RCW 42.17A.005(40) and WAC 390-05-290(3).

³ 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 Respondent's Treasurer, Andrew Hill, reached out to PDC staff by telephone on August 14, 2025 regarding the late C-3 report, dated 5/31/25, that was alleged in the second complaint and indicated that he entered the deposit into their ORCA (Online Reporting Campaign Activity) account but inadvertently failed to submit it. As a newer Treasurer, he did not realize that a separate action was required to certify and submit the report.
- On August 15, 2025, the committee's Treasurer apologized by email for their filing mistakes. He indicated this is the first time he has used ORCA, and that his previous campaigns selected the Mini Reporting option (and therefore did not have to file C-3 and C-4 reports with the PDC). He indicated his belief that all the identified concerns had been mitigated, and their C-4 reports had been appropriately amended.
- The campaign was cooperative throughout our assessment of the complaint, and the Respondent took corrective action as needed.
- The Respondent previously received a written Warning regarding PDC requirements in PDC Case 99586 for failure to file timely C-3 and C-4 reports for election year 2021 as required under RCW 42.17A.235 and .240. The Respondent was a first-time candidate in 2021 and late reporting was the result of her erroneous belief that she had selected the Mini Reporting option on her C-1 report (*Candidate Registration*), which would have relieved her of having to file C-3 and C-4 reports with the PDC.

Late Reporting (2025)

The committee's reporting history for election year 2025 through 10/13/25 is as follows:

- Two C-3 reports, for deposits dated 5/9/25 and 5/31/25 respectively, were each filed 55 days late. The latter C-3 report was alleged in the second complaint.
- Two C-3 reports, for deposits dated 6/30/25 and 7/28/25, were each filed 7 days late.
- Monthly C-4 reports for May and June were filed 55 and 25 days late respectively. The May report was partially mitigated by a lack of expenditures.

The Respondent's monthly C-4 report for July, C-3 reports for deposits dated 8/11/25 and 10/9/25, 21-day pre-General C-4 report (covering 9/1-10/13), and 7-day pre-General C-4 report (covering 10/14-10/27) were all timely filed. The C-4 report for August was not late because the committee did not exceed the \$750 threshold for filing a monthly C-4.

Summary and Resolution

Noncompliance concerning missing sponsor identification (ID) on signs/banners appeared to be a good-faith omission, which you remedied by adding stickers to your signs/banners well in advance of the General Election. It is worth noting that the current sponsor ID requirements for yard signs were added in 2024, so sponsor name and address were not required when you were last a candidate in 2021.

Noncompliance concerning late reports for election year 2025 is mitigated by an inexperienced Treasurer, minimal expenditures, a small and unsophisticated campaign, and the fact that reports were filed well in advance of the General Election.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to 1) include sponsor ID on your signs/banners as required per RCW 42.17A.320; and 2) timely and accurately disclose all contributions and expenditures for 2025 pursuant to RCW 42.17A.235 and .240. Staff expect you to include sponsor ID on all political advertising and timely file all required reports 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.

You also made a minor or ministerial error on a required report (C-4 report) which did not materially harm the public interest. You made the necessary technical correction to amend your campaign start date so the correct 2025 beginning balance now appears within 2-14 days of being notified by PDC staff, as required for a matter resolved as a technical correction. See WAC [390-37-060](#).

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

Any allegations regarding reporting by you for election year 2025 that are not otherwise addressed are hereby dismissed.

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 pdcc@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: David Fetto, Conner Edwards