



**State of Washington**  
**PUBLIC DISCLOSURE COMMISSION**

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**NOTE: On Jan. 1, 2026, Chapter 42.17A was recodified to Title 29B RCW**

January 27, 2026

Delivered electronically to [andrea.bradford@foster.com](mailto:andrea.bradford@foster.com)

Subject: PDC Case 176806 regarding Association of Washington Public Hospital Districts

Association of Washington Public Hospital Districts:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on July 30, 2025. The complaint alleged violations of RCW 42.17A.555. Upon review of the evidence, PDC staff opened a complaint regarding alleged violations of RCW 42.17A.255, .260, .305 and .320 for failure to timely report independent expenditures or electioneering communication and identify sponsor on political advertising.

Applicable Laws and Rules

- RCW 42.17A.255 requires a person making an independent expenditure (IE) equaling \$1,000 or more in the aggregate to disclose the expenditure to the PDC on a C-6 report within five days of making the expenditure. For the purposes of .255, an “independent expenditure” means “any expenditure that is made in support of or opposition to any candidate or ballot proposition and is not otherwise required to be reported pursuant to RCW 42.17A.225, .235 and .240,” which are statutes that set forth reporting requirements for continuing, candidate, political and incidental committees.
- RCW 42.17A.260 requires the sponsor of political advertising file a special report to the commission within 24 hours of, or on the first working day after, the date the political advertising is first published, mailed, or otherwise presented to the public, if the political advertising meets certain criteria. The law also notes what information must be included on the special report.
- RCW 42.17A.305 list the information required on the C-6 report.
- RCW 42.17A.320 requires all written political advertising include the name and address of the sponsor, and this information must be set apart from any other printed matter. WAC 390-18-010 indicates that all advertising must clearly state that it has been paid for by the sponsor. Political advertising undertaken as an independent expenditure or an electioneering communication by a person other than a bona fide political party must also

include the statement “No candidate authorized this ad. It is paid for by (name, address, city, state).” Additional requirements may apply, depending on the sponsor and type of advertising used.

### Background and Findings

- As noted in the complaint, and confirmed by the response submitted by Andrea Bradford, The Association of Washington Public Hospital Districts (AWPHD) mailed a publication on July 16, 2025 in reference to a resolution of King County Public Hospital District No. 2 (Evergreen Health).
- The resolution, Proposition No. 1 Levy Lid Lift for Healthcare Services, appeared on the Aug. 5, 2025 ballot. It was ultimately approved by a margin of 60.83 percent to 39.17 percent.
- PDC staff determined the mailer was political advertising and directed the sponsor to file a C-6 report.
- On Dec. 22, 2025, AWPHD filed an Independent Expenditure Ads (C-6), listing a \$35,474 expenditure to Majority Strategies for an educational mailer.
- The C-6 was filed 154 days late.
- The publication included the words “provided by” and the full name and mailing address of the sponsor.

### Summary and Resolution

As noted above, upon review of the evidence, PDC staff did not investigate the alleged violations of RCW 42.17A.555. Pursuant to WAC 390-37-060(1)(d), you are receiving a formal written warning concerning the failure to timely report independent expenditures. Staff expects you will timely report independent expenditures 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.

Based on this information, the PDC has dismissed this matter in accordance with RCW 29B.60.020(1).

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto: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