

WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION

ANNUAL REPORT

FOR FY 2025

2025 ANNUAL REPORT
WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION

MESSAGE FROM THE CHAIR



The Public Disclosure Commission's unprecedented caseloads persist.

Coming off a year that saw a 400 percent increase in enforcement complaints and a fourfold increase in opened cases, we had wondered if the deluge would continue. It has.

FY2025 followed the previous year's trend. The Commission received over 1,000 new complaints. So, this may be the PDC's new normal.

The continued increase in complaints has strained PDC staff, particularly its 10-person compliance team and 7-person filer assistance team, and resulted in longer case-resolution times. It presents a tremendous challenge to an agency committed to investigating complaints thoroughly and reaching fair and timely resolutions that serve the public's right to transparency in political spending.

I'm proud of how the PDC has handled the stress and challenges of the past two years as we've worked to preserve the agency's goals and its responsibility to Washington voters.

Nearing the end of 2024 with a large backlog of cases, members of the Commission and the PDC's leadership team worked together to create a strategy to prioritize and resolve as many of those complaints as possible, prioritizing cases involving large, high-dollar campaigns with allegations of significant violations, while dismissing with reminders or warnings some allegations of lesser infractions, such as late reporting or incomplete sponsor identification.

It's not an ideal or a long-term solution, but became necessary to preserve our ability to focus on serious infractions. Since then, our staff have implemented other triaging tools to help us manage the workload.

Also, in the past year the Commission voted to almost double penalties for most infractions. These new penalty ranges went into effect on Nov. 5, 2025. The ultimate goal of the PDC is to educate campaigns and prevent future violations. Penalties that strike a balance between being fair and being an adequate deterrent to non-compliance for sophisticated and well-funded campaigns provide a tool to advance that goal.

The majority of campaigns are trying to get it right, and helping them is where we see the greatest returns. The PDC has added to our existing lineup of trainings and one-on-one help with short, virtual lunchtime trainings on topics vital to maintaining compliance with disclosure laws. These sessions were well attended, and will be continued in the next year.

As another part of the PDC's goal of improving transparency, it is constantly improving our online filing systems to simplify reporting for filers. The agency completely redesigned its lobbying reporting system in FY2025 to further this goal.

Compliance with campaign financial disclosure laws remains vital to maintaining transparency in Washington politics, and the PDC plans to continue pursuing that goal for many years to come.

J Leach
Public Disclosure Commission Chair
DECEMBER 2025

PDC adds to traditional classes with lunchtime offerings

While the PDC cut back on in-person events involving travel, due to state budget concerns, it expanded its virtual training opportunities.

Each year, the PDC offers dozens of free, online trainings on topics including basic filing information for candidates and committees, demonstrations of filing systems and tutorials on lobbying rules.

Most of those classes last for about two hours and take place either at 10 a.m. or 1:30 p.m.

Starting in June 2025, Public Disclosure Commission staff began offering "lunch and learn" sessions, which included about 15 minutes of instruction, followed by a 30-minute question and answer period.

The sessions are intended to complement the PDC's more comprehensive trainings on disclosure law by giving candidates and campaign officials a convenient option to brush up on specific reporting or disclosure activities and to get answers to their questions in a more informal setting.

Topics covered in the lunchtime classes included filing contribution and expenditure reports, sponsor identification, prohibitions on using public facilities for campaigns, a guide to political disclosure data online, last-minute contributions and mandatory reports and a guide to wrapping up a campaign.

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PDC OUTREACH: IN-DEPTH

Sunshine Week at the State Capitol

On March 18 and 19, PDC staff set up a booth at the state Legislative Building for Sunshine Week, to promote transparency and discuss the millions of public records available online at **pdc.wa.gov**.

Sunshine Week is a national celebration of transparency in government recognized by nonprofits, good government groups, journalists and agencies like the PDC.

Over the two days, 10 staff members rotated through the booth, and met with about 45 lobbyists, legislators, and other visitors to the state capitol.

Commission pivots to prioritize virtual meetings during budget crunch

A tough budget outlook in early 2025 forced most state agencies to look for cost savings. The PDC was forced to trim its budget in a number of ways, including reducing software purchases, keeping staff positions dark for longer and cutting funding for travel expenses.

Those cuts in travel spending led the Commission to pause its efforts to meet in communities throughout the state at least once per year. The Commission met in Spokane in 2023 and Vancouver in 2024. No meetings were planned outside Olympia in 2025.

The Commission also began holding only every other month's meeting in person in Olympia with the remainder held remotely. All meetings are broadcast on TVW, and available afterward on TVW's website.

PDC OUTREACH: TIMELINE

DEC. 10-11, 2024

PDC Deputy Director Kim Bradford, General Counsel Sean Flynn and Compliance Officer Tabitha Townsend traveled to the 46th annual Council on Governmental Ethics Laws (COGEL) conference in Los Angeles.

Bradford participated in a panel on enforcement trends while Flynn was a presenter at a meeting on grassroots lobbying and "astroturfing" campaigns, and a moderator of a panel on appropriate penalties and remedies.

MARCH 11, 2025

Commission Chair J Leach hosted a virtual engagement session to get feedback on possible changes to campaign expenditure reporting schedules such as including adding additional reporting deadlines before elections, increasing expenditure reporting to twice monthly, and requiring reporting regardless of election participation or campaign activity. About 30 people attended.

MARCH 18-19, 2025

PDC staff celebrated National Sunshine Week, which promotes open government, at the Washington State Legislative Building.

JUNE 2025

PDC staff held the first four of a series of short lunchtime trainings and question and answer sessions, or lunch and learns, in June. The first and third sessions focused on filing campaign contribution reports (C-3) and the second and fourth focused on campaign expenditure reports (C-4). For the month of June 2025, 207 filers attended all PDC classes, compared to 73 in June 2023, the last local election year.

VARIED DATES

In January, March and seven occasions in April 2025, PDC staff met virtually or in person with a variety of groups to discuss rules related to lobbying the state Legislature, and reporting requirements for candidates and committees during election campaigns.

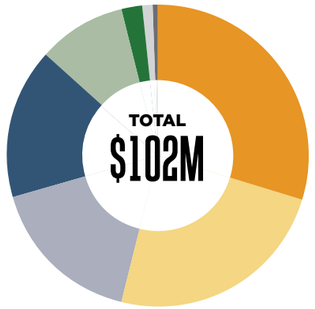
Staff met with groups including Governor's Office staff, the Washington PUD Association, and candidates in Thurston, King, Kittitas, Chelan and Snohomish counties.

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TRACKING THE MONEY

WHO GAVE, HOW MUCH?

Total contributions to candidates and political committees for election year 2025:



$30,309,390 Individual
$9,783,565 Union
$24,773,035 Business
$2,258,953 Self-financing
$16,996,652 Political Action Committee
$915,478 Party
$520,038 Caucus
$16,223,301 Other

Note: Totals on all charts rounded

Seattle races dominate top ten most expensive campaigns

Seattle and King County candidacies and a race to fill an unexpired state Senate term were some of the most expensive campaigns in 2025, unlike in 2023, when Spokane campaigns dominated local election-year spending.

The campaign for Seattle mayoral candidate, and ultimate winner, Katie Wilson, was the most expensive for 2025. The campaign spent just over $1 million in 2025. Combined with independent expenditures spent for her campaign ($273,026) and against her campaign ($1,232,834), total expenditures related to her candidacy reached $2,534,116.

Wilson's opponent, incumbent Mayor Bruce Harrell, came in at No. 4 this year, with his campaign spending $1,162,206, and independent expenditures for him totaling $289,931, and against $117,195, for a total of $1,569,333. Wilson won the election by about 2,000 votes. Wilson's winning campaign spent about $100,000 more than Harrell's 2021 campaign for mayor, in which he ran as an incumbent.

Deb Krishnadasan's campaign for state Senate in the 26th Legislative District was the second most expensive, with a total of $2,387,839, including $825,403 in candidate expenditures, $273,026 in independent expenditures for and $1,232,834 against. Krishnadasan, who was appointed to her seat the previous year, ultimately won a hotly contested race against Rep. Michelle Caldier.

Caldier's campaign was the third most expensive race in 2025, spending $702,807, including $412,716 in independent spending for and $630,144 against her campaign, for a total of $1,745,668.

TOP CANDIDATE CAMPAIGN SPENDING

For election year 2025

- Candidate expenditures
- Independent expenditures "for"
- Independent expenditures "against"

Katie Wilson — TOTAL: $2,534,116
Seattle Mayor

Deb Krishnadasan — $2,387,839
State Senator, Legislative District 26

Michelle Caldier
State Senator, Legislative District 26
$1,745,668

Bruce Harell
Seattle Mayor
$1,569,333

Girmay Zahilay
King County Executive
$1,539,487

Claudia Balducci
King County Executive
$1,112,297

Sara Nelson
Seattle City Council, pos. 9
$1,057,129

Amy Walen
State Senator, Legislative District 48
$1,012,842

Dionne Foster
Seattle City Council, pos. 9
$903,140

Kevin Schilling
State Representative, Legislative District 33
$895,135



Independent expenditures

Seattle's New Direction PAC was 2025's top spender for independent expenditures, weighing in on a number of legislative races.

New Direction PAC spent a total of $1,745,311 on independent expenditures, nearly a third of which, or $630,144, went for ads opposing Michelle Caldier in the race for the state Senate's 26th Legislative District. The PAC also spent $198,780 for ads supporting Caldier's opponent, Deb Krishnadasan, who went on to win the election.

Independent expenditures are made by a third party, often a political action committee, without coordination with a candidate's campaign. Because there is no coordination with the campaign, the expenditures do not qualify as contributions, and do not have a monetary limit.

No. 2 on this year's list is the Bruce Harrell for Seattle's Future committee, which spent more than $1.45 million on independent expenditures in the Seattle mayor's race. Almost all of that — $1.23 million — went for ads against challenger Katie Wilson, who went on to win the election.

Also in the Seattle mayor's race, Katie Wilson for an Affordable Seattle spent $117,000 on ads against Harrell.

WA Wins Sponsored by the Leadership Council spent just over $800,000 on independent expenditures, also in the 26th District senate race. It put most of its money, more than $622,000, into ads against Krishnadasan, with the remainder going to support Caldier.

The Sound Jobs PAC also spent money on the 26th District race, again supporting Caldier and opposing Krishnadasan, while the Jackson Legacy Fund reported independent expenditures for other legislative races and a number of city council and mayor races around the Puget Sound.

TOP INDEPENDENT EXPENDITURE SPONSORS

For election year 2025

New Direction PAC $1,745,311

Bruce Harrell for Seattle's Future $1,466,822

WA Wins Sponsored by The Leadership Council $809,092

Sound Jobs $753,970

Jackson Legacy Fund $581,208

Katie Wilson for an Affordable Seattle $417,893

National Association of Realtors $355,298

Pragmatic Washington $350,214

Washington Realtors Political Action Committee $314,240

Sara for a Better Seattle $311,250

Lobbying expenses

Lobbyists employed to influence state legislation and rulemaking reported more than $86.5 million in compensation, political contributions and expenses in Fiscal Year (FY) 2025, down from $93 million in FY 2024 and $89 million in FY 2023.

This year's top-spending employer of lobbyists, Airbnb, Inc., spent close to $2.5 million to lobby the Washington state Legislature. In comparison, Airbnb, Inc, only reported spending just over $89,000 on lobbying in FY 2024. PDC filings indicate lobbyists working on behalf of Airbnb lobbied on issues including housing, short-term rental rules, technology and local government issues.

No. 2 on this year's list was BP America with $2,152,367 in total lobbying expenses in FY 2025. In the previous fiscal year, BP America reported spending about $1.2 million on lobbying in Washington state. Microsoft, which did not crack the top ten in 2024, was the third-highest spender in 2025, with more than $1.8 million.

TOP LOBBYIST EMPLOYERS

For Fiscal Year 2025

- Lobbyist compensation
- Lobbying expenses and contributions

Airbnb, Inc. — TOTAL: $2,472,459

BP America, Inc. $2,152,367

Microsoft Corp $1,834,215

Washington Federation of State Employees $1,666,579

Building Industry Association of Washington $1,296,149

Amazon.com Services LLC. $1,134,539

T-Mobile USA, Inc. $1,007,720

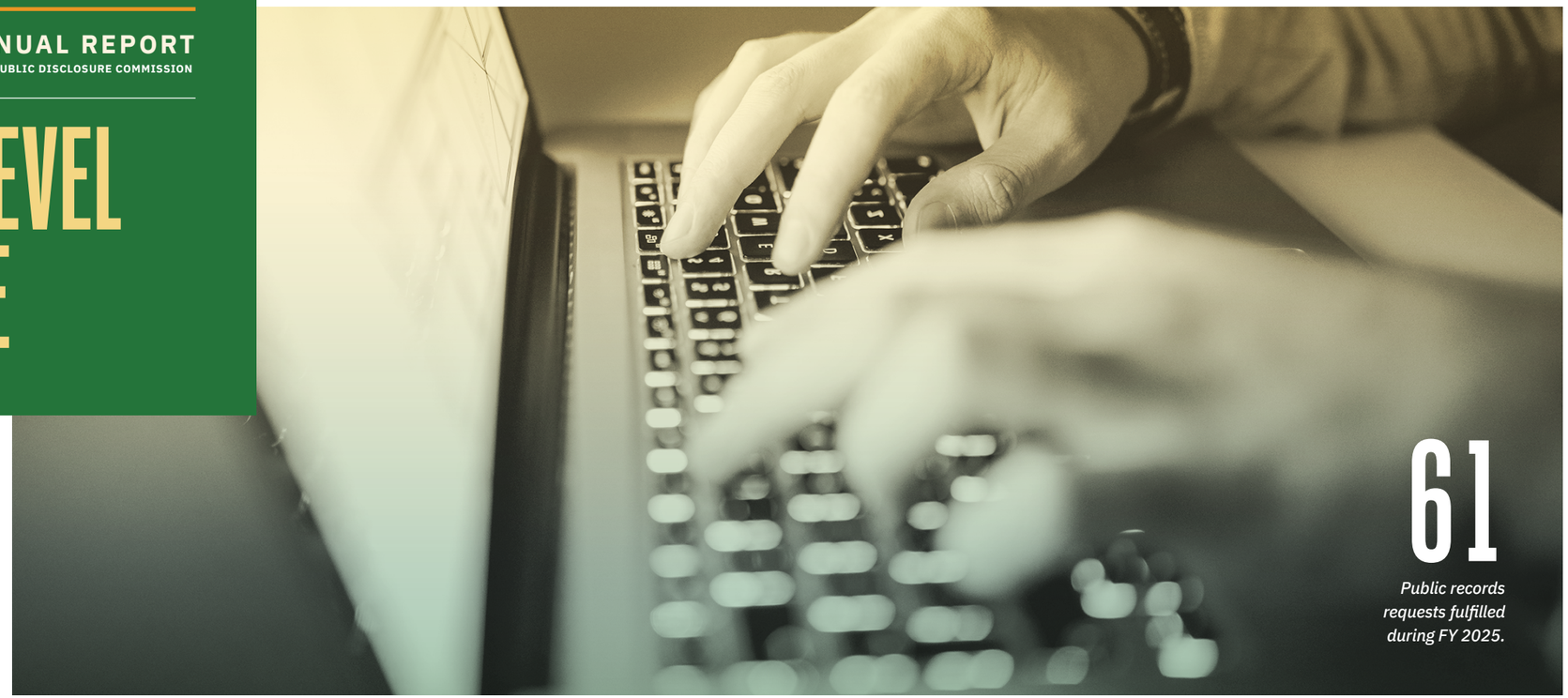
SEIU Healthcare 1199 NW $905,214

Tobacco-Free Action Fund $864,982

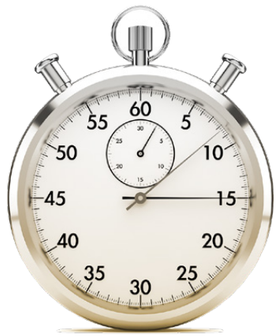
Public School Employees of Washington $545,359

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EXPERT-LEVEL GUIDANCE



61
Public records requests fulfilled during FY 2025.



CUSTOMER SERVICE HELP DESK

Fiscal Year 2025

Type/no. of request	Average first response time
6,230 SIMPLE	**4 hours and 30 minutes**
2,463 COMPLEX	**9 hours and 42 minutes**

TOTAL REQUESTS > **8,693**

RULE CHANGES

PDC adopts permanent rules for sponsor identification on political advertising

In December 2024, the Commission formally adopted permanent rules* for sponsor identification on yard signs as a follow-up to its work on a bill passed in the previous legislative session.

The bill removed an exemption in state law for sponsor ID on yard signs 4 feet by 8 feet or smaller. In the 2024 election cycle, campaigns were advised that signs purchased before June 2024, when emergency rules went into effect, would not face enforcement action for not complying with the new rules.

However, starting in January 2025, all yard signs, regardless of when they were purchased, required sponsor ID of at least 10 percent of the largest font used, or 10 points, whichever is larger. Sponsor ID also includes the sponsor's name and mailing address. Campaigns with older signs were advised to alter them, for example with stickers containing proper sponsor ID.

The permanent rules included a few changes from the emergency rules. For example, a sponsor ID exemption for campaign paraphernalia measuring 4 inches by 15 inches was amended to include items 60 square inches or less.

The Commission also clarified that in the limited instances when sponsor ID is not required, the exemption does not authorize the use of misleading or fake sponsor ID on advertising.

Emergency rulemaking allows parties to promote, oppose votes on ballot measures alongside preferred candidates on sample ballots

In June 2025, the Public Disclosure Commission approved rules as part of an emergency rulemaking process that allow political parties to show their positions on ballot measures on sample ballots.

Emergency rules are in effect for 120 days from the effective date, which can be extended if the Commission pursues a permanent rule change. The rules were in effect in time for the November 2025 election.

The Washington State Democratic Party requested the change, and the Washington State Republican Party concurred in it.

Bona fide state party committees are allowed to have two kinds of accounts: Exempt and non-exempt. These committees can accept unlimited contributions from any donor for their exempt accounts, but are restricted to using those funds to promote voter registration, get-out-the-vote campaigns, and other uses such as sample ballots, which do not count as a contribution to any individual candidate.

Sample ballots (including slate cards) can communicate the party's preferred candidates, as long as they don't include advocacy statements or promote individual candidates, or candidates' positions on issues or platforms, and do not need to be reported or attributed as contributions to any individual campaign.

Under previous PDC rules, sample ballots that included a party's position on any ballot proposition were not exempt from contribution limits and could not be paid for using exempt funds.

*pdcFAQ: Rules vs. Law

Washington state's campaign disclosure law, the Washington Fair Campaign Practices Act, was created in 1972 with the passage of Initiative 276 with 72 percent of the vote. As of this report, it was codified under RCW 42.17A, but will be recodified to 29B in 2026. Only the state Legislature may amend the RCW.

PDC rules, including contribution limits and some of the other categories listed above, are adopted in furtherance of the statutes, and are enacted by the Commission. They are found in WAC 390. Members of the public can petition the Commission to consider rule changes, as the Washington State Democratic Party did in one of the examples above.



Scan this QR code to find records

MILLIONS OF RECORDS ARE JUST A CLICK AWAY

Each year, data reported to the PDC by campaigns, lobbyists and others adds to our millions of records open to the public. With Washington state's Open Data portal at data.wa.gov, anyone with access to the internet can analyze, filter, compare and download data for future study. At the end of FY 2025, there were about 10.2 million records available, up from 9.4 the previous fiscal year.

RECORDS ARE AVAILABLE AT:
www.pdc.wa.gov/political-disclosure-reporting-data/open-data

TRAINING AND OUTREACH BY THE NUMBERS

Fiscal Year 2025

42 Number of trainings

440 Number of participants

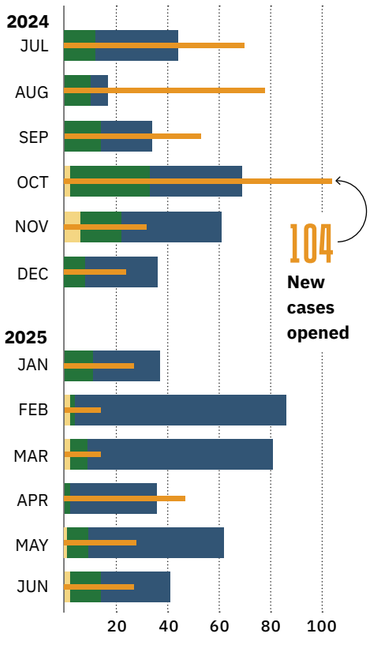
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ENSURING COMPLIANCE

COMPLAINT-BASED CASE RESOLUTION

By month, for Fiscal Year 2025

- Resolved in less than 30 days
- Resolved in 30 to 90 days
- Resolved in more than 90 days
- New cases opened



104 New cases opened

High caseload continues for second straight year

For the second fiscal year in a row, the Public Disclosure Commission received more than 1,000 complaints — a significant increase from past years.

In FY 2025, the PDC received 1,179 complaints, down from 1,563 the previous fiscal year. The complaints resulted in 527 cases opened. Much of the remainder were incorporated into existing cases or dismissed before a case was opened for being unfounded, outside the PDC's jurisdiction or incomplete.

In FY 2024, the agency experienced a 400 percent increase in complaint volume compared to FY 2023's 365 complaints, which was a number on par with previous years.

About 66 percent of FY 2025 complaints were filed by one complainant. In FY 2024, the same complainant filed about 75 percent of all complaints received.

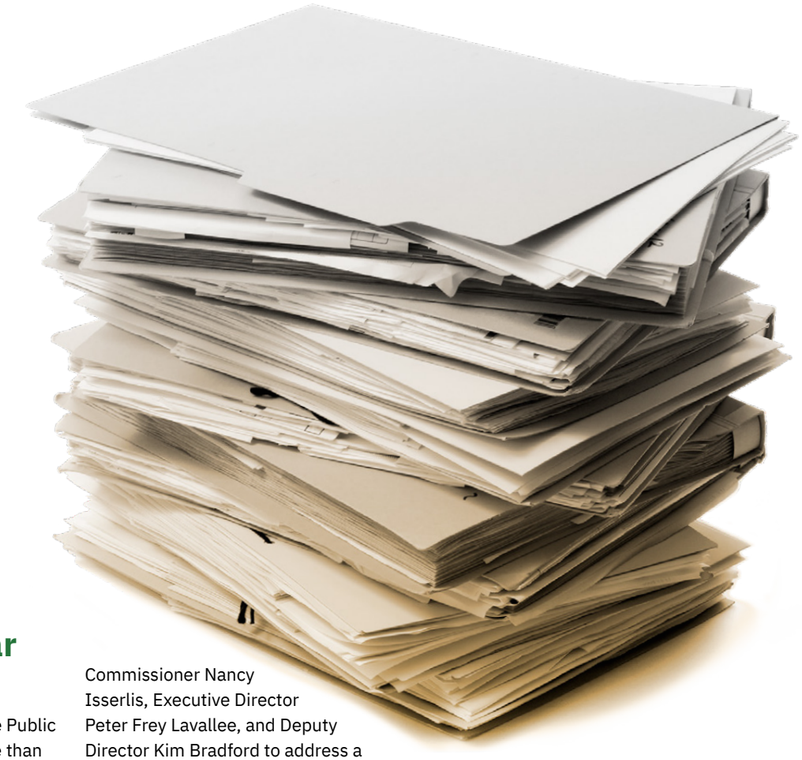
The continued high volume of complaints and caseloads resulted for a second year in an increase in case resolution times. The agency also was not able to resume an audit program paused in 2023, and had to delay some staff-initiated enforcement.

In late 2024, the PDC formed a caseload management workgroup including Commission Chair Allen Hayward, Commissioner Nancy Isserlis, Executive Director Peter Frey Lavallee, and Deputy Director Kim Bradford to address a backlog of recent complaints alleging violations in past election years.

As a result of that work, the Commission directed staff in January 2025 to prioritize the resolution of existing complaints from 2023 and 2024 election years that involved high-profile campaigns or included allegations of violations beyond routine reporting issues.

Staff prioritized cases involving winning candidates with missing reports, committees with a history of significant electoral spending, and campaigns that appeared to have not disclosed financial activity of more than $10,000. The Commission directed staff to dismiss or offer statements of understanding to other respondents that did not match those conditions.

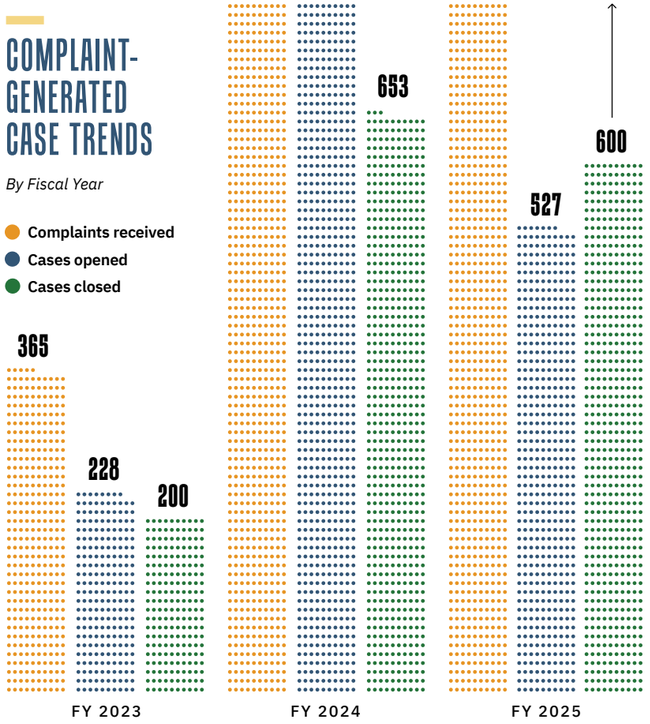
In that spirit, PDC staff continued to work in the lead-up to the 2025 election to streamline case resolution in matters involving missed deadlines or missing details required for full compliance. Expedited resolution for relatively simple cases helped quickly provide campaigns the information needed to correct course and allowed PDC staff to focus on more significant violations.



COMPLAINT-GENERATED CASE TRENDS

By Fiscal Year

- Complaints received
- Cases opened
- Cases closed



600

Cases were resolved in FY 2025, here's how:

- 35 Case closed with no evidence of violations
- 54 Case closed with reminder
- 227 Case closed with written warning
- 67 Dismissed by Executive Director
- 26 Resolved as remedial violation
- 4 Resolved through complaint publication process
- 88 Resolved through statement of understanding
- 31 Resolved with technical correction
- 68 Violation found by Commission



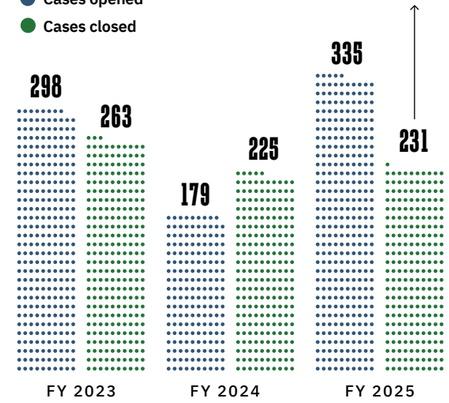
For more information on how the PDC conducts enforcement matters, see our enforcement guide online.

Scan this QR code

STAFF-GENERATED CASE TRENDS

By Fiscal Year

- Cases opened
- Cases closed



231

Cases were resolved in FY 2025, here's how:

- 2 Dismissed by Commission
- 137 Resolved through statement of understanding
- 91 Violation found by commission
- 1 Case closed with no evidence of violation

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ENSURING COMPLIANCE

NOTABLE CASES TO REVIEW

Significant enforcement actions

In the past year, the Public Disclosure Commission conducted a number of major investigations related to the 2024 election cycle. Together, these cases resulted in $56,000 in total fines.

PDC CASE 140213
Let's Go Washington

In October 2024, the PDC fined political committee Let's Go Washington (Sponsored by Brian Heywood) $20,000, with $10,000 suspended*, after finding the committee violated RCW 42.17A.235 and .240 by failing to report expenditures of subvendors for signature-gathering activities related to initiatives in 2024, and by failing to timely provide its books of account to PDC staff upon request during an investigation.

The political action committee formed in 2022 to back several initiatives to the Legislature, and was involved in large signature-gathering operations. Three of the initiatives were accepted by the Legislature in 2024 and became law, and three went to the November 2024 general election ballot and failed. A seventh initiative, filed later than the others (Initiative 2066), was on the ballot and passed.

The PDC filed administrative charges in September 2024, and the case went to a hearing before the full Commission in October 2024.

In addition to the two violations found by the Commission, PDC staff also alleged that Let's Go Washington initially failed to denote in its expenditure reports how much funding went to signature gathering for each of the initiatives it supported, and rather, reported a lump sum for its signature gathering effort as a whole.

The Committee eventually filed amended reports attributing its expenditures equally across the original six initiatives. While PDC staff argued that a more precise breakdown was required, the Commission held that the reporting satisfied PDC rules that were then in effect. The rules have since been amended to clarify the requirements.

Let's Go Washington sought judicial review of the Commission's order, which the King County Superior Court denied on June 3, 2025. The Committee has appealed that decision to the state Court of Appeals, where as of November 2025 the matter was pending review.

PDC CASE 146593
Washington State Republican Party

Also in October 2024, the Commission issued a $5,000 fine, with $1,000 suspended, to the Washington State Republican Party for four campaign finance and political advertising violations.

The Commission found that the party made an illegal contribution to a political committee, accepted over-limit anonymous contributions, failed to include sponsor ID on a text message in the 2023 election, and delayed reporting that expenditure until after the election was over.

The PDC received complaints about a text message, sent days before the 2023 general election, that contained charged language about a school board candidate. The message had no sponsor identification. Campaigns are required to include sponsor identification on text messages, as they are in most other forms of political advertising.

A PDC investigation eventually linked the message to the Washington State Republican Party, which disclosed purchasing the advertising 87 days late, and 80 days after the election.

The party also reported an expenditure of $100,000 from the party's exempt fund to the Let's Go Washington ballot measure committee for unallowable activities. State party committee exempt accounts are not subject to contribution limits, but can only be used for limited purposes, such as get-out-the-vote drives, sample ballots, internal costs or independent expenditures. Direct contributions to other campaigns from that account are not permissible.

The party also initially failed to disclose the source of more than $100,000 in monetary contributions, originally reported as "anonymous" contributions in September 2024. Committees can only accept $500 or 1 percent of their total contributions in a calendar year from anonymous donors. The party later amended reports to disclose names of donors.

PDC CASE 158257
AARP No on I 2124 Sponsored by AARP Washington State

Political action committee AARP No on I 2124 Sponsored by AARP Washington State agreed to pay a $5,000 penalty with $2,500 suspended, approved by the Commission in April 2025, for late reporting of more than $400,000 in contributions during the 2024 election cycle.

After a PDC investigation, the committee stipulated to violations of RCW 42.17A.235 and 42.17A.240 for failing to timely report in-kind contributions totaling $443,561 from its sponsor, AARP Washington State. The majority of that amount, more than $433,000, was reported three days after the November election.

The committee also stipulated to violations of RCW 42.17A.240 and WAC 390-16-037 for initially failing to adequately describe the contributions in reports.

PDC CASE 163092
SEIU Healthcare 1199 NW PAC

Political action committee SEIU Healthcare 1199 NW PAC agreed to pay a $6,000 fine, with $3,000 suspended, for reporting more than $430,000 in expenditures late during the 2024 election cycle, and failing to disclose a last-minute contribution made to a candidate within 21 days of the November election.

The Commission approved the settlement agreement in May 2025.

In the first charge, PDC staff alleged SEIU reported five expenditures late in 2024, totaling $432,400. Three of the expenditures were made Oct. 3, and should have been reported by Oct. 15, but were reported on Nov. 11. The other two were made Oct. 21 and should have been reported by Oct. 29, but were not reported until Nov. 11.

The last-minute candidate contribution was made on Nov. 1, and was reported 36 days late.

The total amount of the late-reported expenditures made up more than two-thirds of the PAC's total of $613,845 in expenditures in 2024.

PDC CASE 163094
Green Jobs PAC

Green Jobs Pac agreed to pay a fine of $20,000 with $10,000 suspended, in 2025 for late reporting of more than $1 million in expenditures in the 2024 election cycle in opposition to statewide Initiative 2117.

The Commission approved the settlement in June 2025.

A PDC investigation found that more than $1 million should have been included in a report due seven days before the 2024 election, but was not reported until November 13, 2024, 15 days late, depriving the public of timely and accurate information in the days before ballots were cast.

Green Jobs PAC also admitted to failing to properly disclose subvendor information on its 21-day and 7-day pre-general election expenditure reports. The reports were amended after the election to include that information, 62 and 48 days late, respectively.

Finally, the PAC admitted to failing to timely disclose the specific ballot measure opposed by each expenditure, as required by law, on expenditures in July, August, September, October and November 2024.

*pdcFAQ: Penalties explained

The Public Disclosure Commission often imposes a penalty with a portion suspended on conditions, such the payment of the non-suspended portion of the penalty and/or filing of missing reports within a set time period, or continued compliance in coming election cycles. If the conditions are not met, the suspended portion of the fine is reinstated.

Appeals court upholds $25M judgment against Meta

In December 2024, the Washington Court of Appeals affirmed a 2022 King County Superior Court ruling upholding a $24.6 million penalty against Facebook parent Meta, Inc., for violating Washington's Fair Campaign Practices Act.

The penalty is believed to be the largest ever imposed for campaign finance violations in United States history. The trial court also had ordered Meta to pay $10.5 million in attorney's fees and other costs.

King County Superior Court ruled in 2022 that Facebook intentionally violated Washington's campaign finance law more than 800 times. Current PDC Commissioner Douglass North wrote the opinion while serving as a King County Superior Court Judge, before his retirement from the bench and appointment to the Commission.

Washington state law requires commercial advertisers — businesses that sell political advertising — to make information about those ads and their purchasers available for the public to inspect upon request. The lawsuit argued that Facebook sold hundreds of ads to Washington state political committees without making that information available.

Facebook again appealed the ruling, which came before the Washington Supreme Court in October 2025.

FINES IN FOCUS

In Fiscal Year 2025, the Public Disclosure Commission assessed penalties totaling $113,000 for 326 cases, down from $137,000 for 319 cases in FY 2024.

The PDC enforces requirements governing the disclosure of campaign finance activities, political advertising, lobbying, personal financial affairs reporting, and alleged use of public facilities to support or oppose a candidate or ballot proposition, in addition to others areas of law identified in RCW 42.17A and WAC 390.

When violations are found, the Commission can assess penalties either through a brief enforcement hearing conducted by a commission chair or designee, or a hearing before the full Commission. Respondents may also face fines when signing a statement of understanding acknowledging that a violation has been committed.

Repeat violations result in progressively higher fines, which follow penalty schedules established in WAC 390. The penalty schedules were updated in 2025, and the new recommendations will be in place for cases resolved after the November 2025 general election.

The maximum penalty that can be assessed by the Commission is $10,000 per violation, unless parties stipulate otherwise. The PDC can also refer cases to the state Office of the Attorney General, which can seek higher fines. Unpaid penalties are sent to a collection agency and can be reported to credit bureaus.

All cases with penalties:

326

Total penalties assessed:

$113,000



2025 ANNUAL REPORT
WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION

A RESPONSIVE ORGANIZATION

Access remains top focus for PDC budget

As in past years, more than half of the Public Disclosure Commission's budget — about $6.1 million in Fiscal Year 2025 — was dedicated to providing public access to the millions of records related to the finances of candidates, political committees, lobbyists, officials and more, all available online at pdc.wa.gov.

Access-related expenses amounted to close to $3.3 million, or 53 percent of the FY 2025 budget, up from $2.9 million in FY 2024, or 51 percent of the total.

Overall, the PDC's budget was up in FY 2025 to $6.1 million, from $5.76 million in FY 2024. The PDC's FY 2026 budget is $6.6 million and relies more heavily on the agency's dedicated Transparency Account funded by enforcement fines, reflecting the cuts that most state agencies incurred during the 2025 legislative session.

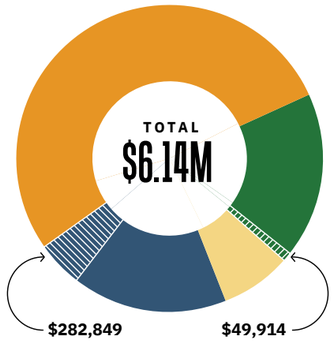
In other expenditures, the PDC spent nearly $1.3 million on enforcement, or 21 percent of its FY 2025 budget, including $282,849 to state Attorney General's Office (AGO). The total is comparable to FY 2024's $1.39 million, while AGO costs for enforcement in 2024 were smaller, at $193,413.

Work on policy issues amounted to $1.1 million in FY 2025, including $49,914 to the AGO, comparable to 2024's $1 million with $34,837 in AGO costs.

Operations costs in FY 2025 were up slightly from $413,575 to $466,922. Agency staff costs are spread among the four categories above consistent with the work done by each position.

EXPENDITURES

For Fiscal Year 2025



$3,272,922 Access
$466,922 Operations
$1,108,940 Policy
$1,288,168 Enforcement

Note: Totals rounded to nearest dollar

PDC LAUNCHES PROGRAM TO INCREASE COMPLIANCE WITH MANDATORY PRE-ELECTION REPORTING

In each election – primary, general and special elections – candidates and committees registered as full-reporting* are required to file expenditure reports (C-4) 21 and 7 days before an election, and on the 10th day of the month following the election.

These reports are due regardless of a campaign's financial activity and are intended to increase transparency during a critical period for campaigns and voters.

In the lead-up to the 2024 primary election, the PDC began a program to more closely monitor compliance with these reports, and to notify candidates whose campaigns had failed to file them by the deadlines.

PDC staff sent 462 reminders and 102 overdue notices for the 21-day report, 458 reminders and 78 overdue notices for the 7-day report and 383 reminders and 62 overdue notices for the post-election report. Staff reported more than 90 percent compliance.

Based on its success in 2024, the program was expanded for the 2025 primary to include an enforcement process. The Commission conducted enforcement hearings for 49 candidates, resulting in fines of $27,350. The program resulted in more than 86 percent compliance.

*pdcFAQ: Full- vs. mini-reporting

Campaigns must choose a reporting option:

- **Mini-reporting campaigns** raise or spend no more than $7,000 (apart from a candidate's filing fee) and take no more than $500 from each contributor (apart from the candidate themselves). They do not owe regular contribution (C-3) or expenditure (C-4) reports, as long as they abide by those restrictions.
- **Full-reporting campaigns** may raise or spend more than $7,000, and must file reports as required by statute, including mandatory pre- and post-election reports.

Campaigns can switch from full to mini at any time, and from mini to full with PDC permission and filing of all necessary back reports.



J. Robert Leach
Commission Chair
JUNE 2023-DEC. 2027



Douglass North
Commission Vice Chair
DEC. 2023-DEC. 2026



Nancy Isserlis
Commission Member
JAN. 2020-AUG. 2025



Jim Oswald
Commission Member
APRIL 2024-DEC. 2028



Allen Hayward
Commission Chair
OCT. 2021-JAN. 2025



Peter Frey Lavallee
Executive Director
SINCE 2017

Agency leadership

The Public Disclosure Commission is governed by a five-member Commission appointed by the governor, with no more than three commissioners from the same political party.

The Commission hires the executive director — since 2017, Peter Frey Lavallee — sets budget and policy guidance for the agency, interprets campaign finance law and adopts administrative rules.

In enforcement matters, commissioners act as a quasi-judicial body, presiding over hearings, determining whether violations have occurred and, if warranted, setting appropriate penalties.

Then-Commission Chair Allen Hayward, who began serving on the Commission in 2021, resigned effective at the end of January 2025, citing personal reasons. J. Robert Leach, a former appellate court judge, took over as Commission Chair, while Douglass North, a former King County judge, stepped up to become vice chair. Hayward's position was not immediately filled.

At the end of calendar year 2024, Commission member and former Chair Nancy Isserlis' five-year term came to an end. However, commissioners are allowed to serve for up to another year while waiting for the Governor's Office to appoint a replacement. Isserlis attended her final meeting on the Commission in August 2025.

OUR MISSION

Promote confidence in the political process

Empower the public to "follow the money" in politics

- Provide real-time access to meaningful data
- Ensure compliance with campaign-finance laws and regulations
- Pursue proactive and equitable enforcement
- Enhance outreach

Help regulated community achieve and maintain compliance

- Provide expert guidance
- Facilitate e-filing for all disclosures with accessible, technologically up-to-date options
- Understand and anticipate filer needs
- Provide additional training opportunities and methods

Continue to build a better, more agile, and more responsive organization

- Exercise flexible and nimble resource allocation
- Seek enhanced funding/staffing
- Identify and respond to emerging trends and issues
- Implement timely process improvements
- Plan for succession needs

Attract and retain a talented and dedicated workforce

- Sustain culture of clean and open government, as embodied in the agency's grassroots heritage
- Provide and encourage opportunities for growth
- Accommodate work/life integration

VISION > The PDC will lead the nation in fostering full disclosure of money in politics.

CONTACT US

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