State of Washington
PUBLIC DISCLOSURE COMMISSION
711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

Memorandum

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: July 6, 2026

Subject: Request from Sarah Hubbard, Reporting Modification

Partial Modification – Background & Request:

- On June 25, 2026, the Public Disclosure Commission (PDC) approved a Petition for Disclosure submitted by the City of Cle Elum pursuant to RCW 29B.20.070 and issued an Order on July 1, 2026.

- On July 2, 2026, the PDC received a request from Sarah Hubbard to be exempted from submitting the Personal Financial Affairs Statement (F-1 report) as required per RCW 29B.55.010.

- Sarah Hubbard was appointed to Cle Elum city council position 4 effective June 1, 2026. Hubbard was required to file an F-1 report within two weeks of the Order date or by no later than July 15, 2026.

- In her request, Hubbard stated she volunteered to fill a vacant city council seat for a term ending in November 2027. Hubbard further stated she joined the city council at a time when the F-1 report was not required and was not initially aware that her and her spouse's personal financial information would need to be disclosed.

- During the initial review of Sarah Hubbard's request, PDC Staff found that, as part of the Cle Elum city council, Hubbard voted in favor of approving the Petition for Disclosure.

Applicable Laws & Rules:

RCW 29B.20.040

Suspension or modification of reporting requirements.

(1) The commission may suspend or modify any of the reporting requirements of this title if it finds that literal application of this title works a manifestly unreasonable hardship in a particular case and the suspension or modification will not frustrate the purposes of this title. The commission may suspend or modify reporting requirements only to the extent necessary to substantially relieve the hardship and only after a hearing is held and the suspension or modification receives approval. A suspension or modification of the financial affairs reporting requirements in RCW 29B.55.030 may be approved for an elected official's term of office or for up to three years for an executive state officer. If a material change in the applicant's circumstances or relevant information occurs or has occurred, the applicant must request a modification at least one month prior to the next filing deadline rather than at the conclusion of the term.
(2) A manifestly unreasonable hardship exists if reporting the name of an entity required to be reported under RCW 29B.55.030(1)(g)(ii) would be likely to adversely affect the competitive position of any entity in which the person filing the report, or any member of the person's immediate family, holds any office, directorship, general partnership interest, or an ownership interest of 10 percent or more.
(3) Requests for reporting modifications may be heard in a brief adjudicative proceeding as set forth in RCW 34.05.482 through 34.05.494 and in accordance with the standards established in this section. The commission, the commission chair acting as presiding officer, or another commissioner appointed by the chair to serve as presiding officer, may preside over a brief adjudicatory proceeding. If a modification is requested by a filer because of a concern for personal safety, the information submitted regarding that safety concern shall not be made public prior to, or at, the hearing on the request. Any information provided or prepared for the modification hearing shall remain exempt from public disclosure under this title and chapter 42.56 RCW to the extent it is determined at the hearing that disclosure of such information would present a personal safety risk to a reasonable person.
(4) If the commission, or presiding officer, grants a modification request, the commission or presiding officer may apply the modification retroactively to previously filed reports. In that event, previously reported information of the kind that is no longer being reported is confidential and exempt from public disclosure under this title and chapter 42.56 RCW.
(5) Any citizen has standing to bring an action in Thurston county superior court to contest the propriety of any order entered under this section within one year from the date of the entry of the order.
(6) The commission shall adopt rules governing the proceedings.

RCW 29B.20.070

Application of reporting requirements in small political subdivisions.

(1) Except as provided in subsections (2), (3), and (7) of this section, the reporting provisions of this title do not apply to:
(a) Candidates, elected officials, and agencies in political subdivisions with fewer than 2,000 registered voters as of the date of the most recent general election in the jurisdiction;
(b) Political committees formed to support or oppose candidates or ballot propositions in such political subdivisions; or
(c) Persons making independent expenditures in support of or opposition to such ballot propositions.
(2) The reporting provisions of this title apply in any exempt political subdivision from which a "petition for disclosure" containing the valid signatures of 15 percent of the number of registered voters, as of the date of the most recent general election in the political subdivision, is filed with the commission. The commission shall by rule prescribe the form of the petition. After the signatures are gathered, the petition shall be presented to the auditor or elections officer of the county, or counties, in which the political subdivision is located. The auditor or elections officer shall verify the signatures and certify to the commission that the petition contains no less than the required number of valid signatures. The commission, upon receipt of a valid petition, shall order every known affected person in the political subdivision to file the initially required statement and reports within 14 days of the date of the order.
(3) The reporting provisions of this title apply in any exempt political subdivision that by ordinance, resolution, or other official action has petitioned the commission to make the provisions applicable to elected officials and candidates of the exempt political subdivision. A copy of the action shall be sent to the commission. If the commission finds the petition to be a valid action of the appropriate governing body or authority, the commission shall order every known affected person in the political subdivision to file the initially required statement and reports within 14 days of the date of the order.
(4) The commission shall void any order issued by it pursuant to subsection (2) or (3) of this section when, at least four years after issuing the order, the commission is presented a petition or official action so requesting from the affected political subdivision. Such petition or official action shall meet the respective requirements of subsection (2) or (3) of this section.
(5) Any petition for disclosure, ordinance, resolution, or official action of an agency petitioning the commission to void the exemption in RCW 29B.25.010(3) shall not be considered unless it has been filed with the commission:
(a) In the case of a ballot proposition, at least 60 days before the date of any election in which campaign finance reporting is to be required;
(b) In the case of a candidate, at least 60 days before the first day on which a person may file a declaration of candidacy for any election in which campaign finance reporting is to be required.
(6) Any person exempted from reporting under this title may at the person's option file the statement and reports.

(7) The reporting provisions of this title apply to a candidate in any political subdivision if the candidate receives or expects to receive five thousand dollars or more in contributions.

RCW 29B.55.010
Elected officials, executive state officers, candidates, and appointees—Statement of financial affairs.

(1) After January 1st and before April 15th of each year, every elected official and every executive state officer who served for any portion of the preceding year shall electronically file with the commission a statement of financial affairs for the preceding calendar year or for that portion of the year served. Any official or officer in office for any period of time in a calendar year, but not in office as of January 1st of the following year, may electronically file either within 60 days of leaving office or during the January 1st through April 15th reporting period of that following year. Such filing must include information for the portion of the current calendar year for which the official or officer was in office.
(2) Within two weeks of becoming a candidate, every candidate shall file with the commission a statement of financial affairs for the preceding 12 months.
(3) Within two weeks of appointment, every person appointed to a vacancy in an elective office or executive state officer position during the months of January through November shall file with the commission a statement of financial affairs for the preceding 12 months, except as provided in subsection (4) of this section. For appointments made in December, the appointee must file the statement of financial affairs between January 1st and January 15th of the immediate following year for the preceding 12-month period ending on December 31st.
(4) A statement of a candidate or appointee filed during the period from January 1st to April 15th shall cover the period from January 1st of the preceding calendar year to the time of candidacy or appointment if the filing of the statement would relieve the individual of a prior obligation to file a statement covering the entire preceding calendar year.
(5) No individual may be required to file more than once in any calendar year.
(6) Each statement of financial affairs filed under this section shall be sworn as to its truth and accuracy.
(7) Every elected official and every executive state officer shall file with their statement of financial affairs a statement certifying that they have read and are familiar with RCW 29B.45.010 or 42.52.180, whichever is applicable.
(8) For the purposes of this section, the term "executive state officer" includes those listed in RCW 29B.55.020.
(9) This section does not apply to incumbents or candidates for a federal office or the office of precinct committee officer.