State of Washington
PUBLIC DISCLOSURE COMMISSION
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Memorandum

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: September 2, 2026

Subject: Request from Raven Buckingham Aäe, Reporting Modification

Partial Modification – Background & Request:

- On September 2, 2026, the Public Disclosure Commission (PDC) received a request from Raven Buckingham Aäe to be exempted from submitting a photograph as part of their lobbying registration as required per RCW 29B.50.030.

- Raven Buckingham Aäe is a new lobbyist whose contract with employer, FreeFrom, begins on September 15, 2026.

- In their request, Buckingham Aäe stated that they are a survivor of gender-based violence and must limit their information to protect themselves and their family.

- Buckingham Aäe's application disclosed most potentially reportable information required per RCW 29B.50.010.

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.50/010

Registration of lobbyists.

(1) Before lobbying, or within 30 days after being employed as a lobbyist, whichever occurs first, unless exempt under RCW 29B.50.040, a lobbyist shall register by filing with the commission a lobbyist registration statement, in such detail as the commission shall prescribe, that includes the following information:
(a) The lobbyist's name, permanent business address, electronic contact information, and any temporary residential and business addresses in Thurston county during the legislative session;
(b) The name, address and occupation or business of the lobbyist's employer;
(c) The duration of the lobbyist's employment;
(d) The compensation to be received for lobbying, the amount to be paid for expenses, and what expenses are to be reimbursed;
(e) Whether the lobbyist is employed solely as a lobbyist or whether the lobbyist is a regular employee performing services for the lobbyist's employer which include but are not limited to the influencing of legislation;
(f) The general subject or subjects to be lobbied;
(g) A written authorization from each of the lobbyist's employers confirming such employment;
(h) The name, address, and electronic contact information of the person who will have custody of the accounts, bills, receipts, books, papers, and documents required to be kept under this title;
(i) If the lobbyist's employer is an entity (including, but not limited to, business and trade associations) whose members include, or which as a representative entity undertakes lobbying activities for, businesses, groups, associations, or organizations, the name and address of each member of such entity or person represented by such entity whose fees, dues, payments, or other consideration paid to such entity during either of the prior two years have exceeded *five hundred dollars or who is obligated to or has agreed to pay fees, dues, payments, or other consideration exceeding *five hundred dollars to such entity during the current year;
(j) An attestation that the lobbyist has read and completed a training course provided under RCW 44.04.390 regarding the legislative code of conduct and any policies related to appropriate conduct adopted by the senate or the house of representatives.
(2) Any lobbyist who receives or is to receive compensation from more than one person for lobbying shall file a separate notice of representation for each person. However, if two or more persons are jointly paying or contributing to the payment of the lobbyist, the lobbyist may file a single statement detailing the name, business address, and occupation of each person paying or contributing and the respective amounts to be paid or contributed.
(3) Whenever a change, modification, or termination of the lobbyist's employment occurs, the lobbyist shall file with the commission an amended registration statement within one week of the change, modification, or termination.
(4) Each registered lobbyist shall file a new registration statement, revised as appropriate, on the second Monday in January of each odd-numbered year. Failure to do so terminates the lobbyist's registration.

RCW 29B.50/030

Photograph and information—Publication.

Each lobbyist shall at the time the lobbyist registers submit electronically to the commission a recent photograph of the lobbyist of a size and format as determined by rule of the commission, together with the name of the lobbyist's employer, the length of the lobbyist's employment as a lobbyist before the legislature, a brief biographical description, and any other information the lobbyist may wish to submit not to exceed 50 words in length. The photograph, information, and attestation submitted under RCW 29B.50.010(1)(j) shall be published by the commission on its website.