State of Washington
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Memo

To: PDC Commissioners
From: Sean Flynn, General Counsel
Date: October 15, 2026
Re: DRAFT Proposed rules re campaign expenditure reporting

The agency initiated rulemaking on April 10, 2026, to update rules on how campaigns report expenditure details. Staff have prepared a draft of the proposed rules for the Commission to consider. When ready, the proposal will be published for public comment at set for a hearing to discuss any additional changes and ultimate adoption of the rule changes. This memo summarizes the purpose and extent of the rulemaking changes in the draft proposal.

Registered committees must file expenditure activity C-4 reports each month and during special pre-election periods when the campaign is participating in that election. The reports require details for itemized expenditures over $200, including the purpose of each expenditure. Expenditure reporting is a critical component of the state disclosure laws and provides valuable information to the public on campaign practices and activities used to influence elections.

PDC rules expound upon the level of detail required for expenditure reporting. However, those rules have not been substantively updated since 1996, and do not address newer categories and types of expenditure activities, for example digital advertising. Furthermore, the rules are limited in specific instruction for reporting the details of in-kind contributions as well as subvendor activity. PDC staff believe providing more specificity in the rules will assist campaigns in filing complete and accurate reports.

The proposed rules update the required expenditure detail reporting in several areas, including:

- A detailed description of itemized expenditures, including specific elements for reporting political advertising, broken down by media type and including digital ads. WAC 390-16-037.
- A description of subvendor expenses when paid through an agent of the campaign. For example, this includes transactions paying for advertising through a consultant. WAC 390-16-205.
- A description of expenditure activity reported as an in-kind contribution by the receiving committee. In-kind contributions are reported by the contributing committee as well, but the receiving committee is responsible for details of value of the goods or services. WAC 390-16-207.