State of Washington
PUBLIC DISCLOSURE COMMISSION
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Memorandum

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: September 29, 2026

Subject: Request from Brian Joseph Smith, Reporting Modification

Partial Modification – Background & Request:

- On September 4, 2026, the Public Disclosure Commission (PDC) received a request from Brian Joseph Smith for redaction of a residential address used on his own 2013 campaign registrations and other reports, required to be disclosed pursuant to the filing requirements described in RCW 29B.25.020 and RCW 29B.25B.100.

- Brian Joseph Smith was a candidate for Vancouver City Council in the 2013 election and, after successfully switching from the "Full Reporting" Option in June 2013, his campaign stayed under the "Mini Reporting" Option.

- Before Smith switched to the "Mini Reporting" Option, he filed one C-3 report disclosing a $500 candidate loan.

- Joseph Smith requested redaction of his residence due to safety concerns. Joseph Smith referenced an ongoing Federal Bureau of Investigation (FBI) investigation involving threats to himself and his family and he is a participant in the Address Confidentiality Program.

- Brian Joseph Smith's records would be exempt from public disclosure if the Commission finds in accordance with RCW 29B.20.040 and WAC 390-28-080 that disclosure of such information would present a personal risk to a reasonable person.

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.25.020

Statement of organization by political committees.
(1) Every political committee shall file a statement of organization with the commission. The statement must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. A political committee organized within the last three weeks before an election and having the expectation of receiving contributions or making expenditures during and for that election campaign shall file a statement of organization within three business days after its organization or when it first has the expectation of receiving contributions or making expenditures in the election campaign.
(2) The statement of organization shall include but not be limited to:
(a) The name, address, and electronic contact information of the committee;
(b) The names, addresses, and electronic contact information of all related or affiliated committees or other persons, and the nature of the relationship or affiliation;
(c) The names, addresses, and titles of its officers; or if it has no officers, the names, addresses, and titles of its responsible leaders;
(d) The name, address, and electronic contact information of its treasurer and depository;
(e) A statement whether the committee is a continuing one;
(f) The name, office sought, and party affiliation of each candidate whom the committee is supporting or opposing, and, if the committee is supporting the entire ticket of any party, the name of the party;
(g) The ballot proposition concerned, if any, and whether the committee is in favor of or opposed to such proposition;
(h) What distribution of surplus funds will be made, in accordance with RCW 29B.40.090, in the event of dissolution;
(i) Such other information as the commission may by rule prescribe, in keeping with the policies and purposes of this title;
(j) The name, address, and title of any person who authorizes expenditures or makes decisions on behalf of the candidate or committee; and
(k) The name, address, and title of any person who is paid by or is a volunteer for a candidate or political committee to perform ministerial functions and who performs ministerial functions on behalf of two or more candidates or committees.
(3) No two political committees may have the same name.
(4) Any material change in information previously submitted in a statement of organization shall be reported to the commission within the 10 days following the change.
(5) As used in this section, the "name" of a sponsored committee must include the name of the person who is the sponsor of the committee. If more than one person meets the definition of sponsor, the name of the committee must include the name of at least one sponsor, but may include the names of other sponsors. A person may sponsor only one political committee for the same elected office or same ballot proposition per election cycle.

RCW 29B.25.100

Contents of report.

Each report required under RCW **29B.25.090** (1) through (4) must be certified as correct by the treasurer and the candidate and shall disclose the following, except an incidental committee only must disclose and certify as correct the information required under subsections (2)(d) and (7) of this section:

(1) The funds on hand at the beginning of the period;

(2) The name and address of each person who has made one or more contributions during the period, together with the money value and date of each contribution and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with the following exceptions:

(a) Pledges in the aggregate of less than one hundred dollars from any one person need not be reported;

(b) Income that results from a fund-raising activity conducted in accordance with RCW **29B.25.080** may be reported as one lump sum, with the exception of that portion received from persons whose names and addresses are required to be included in the report required by RCW **29B.25.080**;

(c) Contributions of no more than twenty-five dollars in the aggregate from any one person during the election campaign may be reported as one lump sum if the treasurer maintains a separate and private list of the name, address, and amount of each such contributor;

(d) Payments received by an incidental committee from any one person need not be reported unless the person is one of the committee's 10 largest sources of payments received, including any persons tied as the 10th largest source of payments received, during the current calendar year, and the value of the cumulative payments received from that person during the current calendar year is ten thousand dollars or greater. For payments to incidental committees from multiple persons received in aggregated form, any payment of more than ten thousand dollars from any single person must be reported, but the aggregated payment itself may not be reported. The commission may suspend or modify reporting requirements for payments received by an incidental committee in cases of manifestly unreasonable hardship under this title;

(e) Payments from private foundations organized under section 501(c)(3) of the internal revenue code to an incidental committee do not have to be reported if:

(i) The private foundation is contracting with the incidental committee for a specific purpose other than election campaign purposes;

(ii) Use of the funds for election campaign purposes is explicitly prohibited by contract; and

(iii) Funding from the private foundation represents less than 25 percent of the incidental committee's total budget;

(f) Commentary or analysis on a ballot proposition by an incidental committee is not considered a contribution if it does not advocate specifically to vote for or against the ballot proposition; and

(g) The money value of contributions of postage is the face value of the postage;

(3) Each loan, promissory note, or security instrument to be used by or for the benefit of the candidate or political committee made by any person, including the names and addresses of the lender and each person liable directly, indirectly or contingently and the date and amount of each such loan, promissory note, or security instrument;

(4) All other contributions not otherwise listed or exempted;

(5) A statement that the candidate or political committee has received a certification from any partnership, association, corporation, organization, or other combination of persons making a contribution to the candidate or political committee that:

(a) The contribution is not financed in any part by a foreign national; and

(b) Foreign nationals are not involved in making decisions regarding the contribution in any way;

(6) The name and address of each candidate or political committee to which any transfer of funds was made, including the amounts and dates of the transfers;

(7) The name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures. An incidental committee only must report on expenditures, made and reportable as contributions as defined in RCW **29B.10.160**, to election campaigns. For purposes of this subsection, commentary or analysis on a ballot proposition by an incidental committee is not considered an expenditure if it does not advocate specifically to vote for or against the ballot proposition;

(8) The name, address, and electronic contact information of each person to whom an expenditure was made for soliciting or procuring signatures on an initiative or referendum petition, the amount of the compensation to each person, and the total expenditures made for this purpose. Such expenditures shall be reported under this subsection in addition to what is required to be reported under subsection (7) of this section;

(9)(a) The name and address of any person and the amount owed for any debt with a value of more than seven hundred fifty dollars that has not been paid for any invoices submitted, goods received, or services performed, within five business days during the period within 30 days before an election, or within 10 business days during any other period.

(b) For purposes of this subsection, debt does not include regularly recurring expenditures of the same amount that have already been reported at least once and that are not late or outstanding;

(10) The surplus or deficit of contributions over expenditures;

(11) The disposition made in accordance with RCW **29B.40.090** of any surplus funds; and

(12) Any other information required by the commission by rule in conformance with the policies and purposes of this title.