



**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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

February 3, 2025

Delivered electronically to [info@8.unitehere.org](mailto:info@8.unitehere.org), [cindy@8.unitehere.org](mailto:cindy@8.unitehere.org), [stefan@8.unitehere.org](mailto:stefan@8.unitehere.org),  
[lawlor@workerlaw.com](mailto:lawlor@workerlaw.com)

Subject: Complaint filed by Conner Edwards, PDC Case 161097

Dear UNITE HERE Local 8 PAC:

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Conner Edwards, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Conner Edwards. PDC staff expects you to timely file all required reports of contributions and expenditures in future years. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1). Any allegations regarding reporting for the 2023 and 2024 calendar years not otherwise addressed here are hereby dismissed.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Electronically signed Alice Fiman  
Alice Fiman  
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley  
Peter Frey Lavalley  
Executive Director



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February 3, 2025

Delivered electronically to cg.edwards53@gmail.com

Subject: Complaint regarding UNITE HERE Local 8 PAC, PDC Case 161097

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed Sept. 27, 2024. The complaint alleged UNITE HERE Local 8 PAC (UNITE HERE) may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file Cash Receipts Monetary Contributions (C-3) reports and Campaign Summary Receipts and Expenditures (C-4) reports, disclosing contributions and expenditures undertaken by UNITE HERE during 2023 and 2024.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response provided by UNITE HERE; the applicable PDC reports filed by UNITE HERE; data in the PDC contribution and expenditure database; and other relevant information, to determine whether the record supports the finding of one or more violations.

Applicable Laws & Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.240 requires committees file accurate campaign finance reports with the Public Disclosure Commission.

Background & Findings

PDC staff review found the following:

Election Year 2023:

- On its 2023 Committee Registration, UNITE HERE listed the PAC was supporting:
  - Maren Costa, Tammy J. Morales, Jacqueline J. Hollingsworth, Ronald Paul Davis, Cathy Moore and Daniel Strauss.
- The complaint alleged UNITE HERE was supporting candidates in both the 2023 Primary and General elections, but failed to file 21-day, 7-day, and post-election C-4s during both election cycles.

- UNITE HERE filed a C-4 on Oct. 27, 2023, for the period of Jan. 1 – Oct. 31, 2023. The C-4 listed \$102,628.81 in contributions and \$102,591.84 in expenditures.
  - The contributions were deposited Jan. 1 (\$171.81), Feb. 22 (\$250), Aug. 8 (\$2,200) and Oct. 11 (\$100,000).
  - On the corresponding C-3s (filed Oct. 16 and 27), all the contributions were listed as being received from the sponsoring organization, UNITE HERE Local 8.
- Committees are required to file C-4s monthly once the campaign has more than \$750 in contributions or expenditures during the month. Committees are required to file C-3s for each bank deposit with the C-4s. However, beginning June 1, each deposit must be reported no later than the following Monday.
- UNITE HERE reached \$750 in contributions or expenditures in August 2023.
- If a PAC was participating in the 2023 Primary Election, it was required to file C-4s on July 11, July 25 and Sept. 11, 2023.
- UNITE HERE reported a contribution to Friends of Girmay on Feb. 13, 2023; however this candidate did not participate in the 2023 Primary Election.
- On Aug. 1, 2023, UNITE HERE made expenditures to Fred for Port (\$500), Friends of Sam Cho (\$500) and People for Theresa (\$1,200), candidates participating in the 2023 Primary Election.
- UNITE HERE was required to file a C-4 on Sept. 11, 2023, listing all contributions and expenditures made through Aug. 31, 2023.
- As noted, UNITE HERE filed its first C-4 on Oct. 27, 2023, making the expenditures made prior to Sept. 1, 2023, reported 46 days late.
- PACs participating in the 2023 General Election were required to file C-4s on Oct. 17, Oct. 31, and Dec. 11.
- UNITE HERE reported it made four expenditures on Oct. 13, which were timely reported on C-6 reports. These expenditures supported Seattle City Council candidates totaling \$98,941.84, and were reported on a C-4 on Oct. 27, 2023, 10 days late.
- The complaint alleged the UNITE HERE did not provide the required detail on its C-4 report, listing the candidates supported or opposed. UNITE HERE updated its C-4 to include the detail. However, this was not required under WAC 390-16-037 prior to June 24, 2024 if the information was listed on its registration.
- UNITE HERE filed two C-4s on Dec. 4, 2024, one covering November 2023 and one covering December 2023. Both listed zero activity.

#### Election Year 2024:

- UNITE HERE updated its 2024 Committee Registration on Oct. 15, 2024, listing support for Bob Ferguson for Governor.
- Committees are required to file C-4s monthly once the campaign has more than \$750 in contributions or expenditures during the month. Committees are required to file C-3s for each bank deposit with the C-4s. However, beginning June 1, each deposit must be reported no later than the following Monday.
- PACs participating in the 2024 Primary Election were required to file C-4s on July 16, July 30, and Sept. 10. PACs participating in the 2024 General Election were required to file C-4s on Oct. 15, Oct. 29, and Dec. 10.
- On Sept. 24, 2024, UNITE HERE filed its first reports of 2024, one C-3 listing a \$3,750 contribution received Aug. 1 from UNITE HERE Local 8 and a C-4 listing an Aug. 1

expenditure to Bob Ferguson for Governor for \$3,750. The C-3 report was filed 50 days late and the C-4 report was filed 14 days late.

### Summary and Resolution

Pursuant to WAC 390-37-060(1)(d), UNITE HERE will receive a formal written warning concerning the failure to timely disclosure contribution and expenditures during 2023 and 2024. The formal written warning will include staff's expectation UNITE HERE timely files all future required reports of contributions and expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Electronically signed Alice Fiman

Alice Fiman  
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavelle

Peter Frey Lavelle  
Executive Director

cc: UNITE HERE Local 8 PAC