



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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February 13, 2025

Delivered electronically to rick@quinnthomas.com

Subject: PDC Case 164569 regarding Evergreen Recycling Refund Coalition

Evergreen Recycling Refund Coalition:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on November 4, 2024. The complaint alleged violations of RCW 42.17A.640 for failure to accurately report expenditures of a grassroots lobbying campaign.

Applicable Laws & Rules

[RCW 42.17A.640](#) requires sponsors of grassroots lobbying campaigns to file monthly reports with the PDC showing totals of expenditures made during the month.

In December 2023, the Public Disclosure Commission approved new rules for grassroots lobbying under [WAC 390-20-125](#) that went into effect on January 8, 2024. WAC 390-20-125 now requires that expenditures made on behalf of a grass roots lobbying campaign must be reported by financial category with sufficient detail and itemization to provide the public a reasonable understanding of the nature and scope of the expenditure. Expenditures for advertising or other form of mass communication must be segregated by media type, including: (i) The name and address of any commercial advertiser that sold the advertising; (ii) The quantity of each printed media distributed, or the name and location of each publication, outlet, or platform where the advertisement or communication appeared; (iii) The date or dates that the advertising or communication was broadcast, distributed, published, or otherwise presented to the public; and (iv) A description of the major work components or tasks that were provided by media type.

Background & Findings

- On January 3, 2024, you filed an L-6 report with the PDC registering a grassroots lobbying campaign. You also filed a monthly L-6 report on February 5, 2024, covering activities in January 2024, and a final L-6 report on March 6, 2024, upon the conclusion of the campaign.
- The complaint alleged that the L-6 report covering January 2024 did not disclose the required level of detail for digital advertising expenditures. PDC staff identified a similar lack of detail in the final L-6 report for the campaign.

- On January 3, 2025, PDC staff contacted you and subsequently provided clarification regarding the details required for inclusion in L-6 reports and the updated L-6 report template.
- On February 10, 2024, you filed an amended L-6 report for January 2024 and an amended final L-6 report. Both amended L-6 reports use the updated template and disclose the required details regarding the campaign's advertising expenditures.

Summary and Resolution

It appears that, prior to the complaint, you were not fully aware of the new requirement to disclose details of digital advertising expenditures in L-6 reports, and did not intend to purposefully conceal information regarding the campaign's expenditures. The PDC did not publish an updated L-6 report template to more easily disclose the newly required information until mid-2024, which may have contributed to confusion regarding the level of detail required.

Based on our findings, staff has determined that, in this instance, failure to accurately disclose expenditures of a grassroots lobbying campaign does not amount to a finding of a violation that calls for further investigation.

PDC staff is reminding you about the importance of accurately disclosing expenditure activities of grassroots lobbying campaigns and timely filing all future L-6 reports, in accordance with RCW 42.17A.640 and WAC 390-20-125.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

Any allegations regarding reporting by you for the Evergreen Recycling Refund Coalition grassroots lobbying campaign that are not otherwise addressed are hereby dismissed.

If you have questions, you may contact Casey Gayman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Casey Gayman

Casey Gayman
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Conner Edwards