



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 7, 2025

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Subject: PDC Case 166613 regarding SEIU 775 Ballot Fund

SEIU 775 Ballot Fund:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on February 6, 2025. The complaint alleged violations of RCW 42.17A.235 and .240 for failing to timely file expenditures reports prior to the February 11, 2025, special election.

Applicable Laws and Rules

- [RCW 42.17A.225\(3\)](#) requires that if a continuing political committee makes a contribution in support of or in opposition to a candidate or ballot proposition within sixty days before the date that the candidate or ballot proposition will be voted upon, the committee shall report pursuant to RCW 42.17A.235.
- [RCW 42.17A.235\(2\)](#) states that each treasurer of a candidate or political committee, or an incidental committee, required to file a statement of organization under this chapter, shall file with the commission a report, for each election in which a candidate, political committee, or incidental committee is participating, containing the information required by RCW 42.17A.240 on the twenty-first day and the seventh day immediately preceding the date on which the election is held.

Background and Findings

- The complaint alleged that SEIU 775 Ballot Fund, a continuing political committee, contributed to a political committee participating in the February 11, 2025, special election, and was required to file the 21-day and 7-day pre-election C-4 reports for that election.
- Raise The Wage Burien, a committee supporting Initiative Measure No. 1 in the City of Burien in the February 11, 2025, special election, reported receiving a \$2,500 contribution from SEIU 775 Ballot Fund on January 27, 2025, on a *Cash Receipts Monetary Contributions* report (C-3 report) filed on January 27, 2025.
- By contributing to Raise The Wage Burien within 60 days of the February 11, 2025, special election, SEIU 775 Ballot Fund was obligated to file a 7-day pre-election *Campaign Summary Receipts & Expenditures* report (C-4 report) on February 4, 2025, disclosing activities through February 3, 2025.

- On February 7, 2025, SEIU 775 Ballot Fund filed a monthly C-4 report covering activities from January 1-31, 2025, and disclosing the \$2,500 expenditure to Raise The Wage Burien.
- In response to the complaint, SEIU 775 Ballot Fund's legal representatives asserted that SEIU 775 Ballot Fund was not aware that the 7-day pre-election report requirement that applies to primary and general elections is also required with regard to special elections in which the political committee participates.
- A mitigating factor in this case is that the \$2,500 contribution to Raise The Wage Burien was the only SEIU 775 Ballot Fund contribution in support of a candidate or ballot proposition in the special election. SEIU 775 Ballot Fund's legal representatives confirmed that there were no activities during the period between January 31, 2025, and February 3, 2025, that were not disclosed. The public therefore was not deprived of information prior to the election.
- An aggravating factor is that Service Employees International Union 775 Quality Care Committee, a continuing political committee whose officers are also the officers of SEIU 775 Ballot Fund, received a reminder in PDC Case 159779 on October 11, 2024, regarding its failure to file a 7-day C-4 report prior to the August 2024 primary election.

Summary and Resolution

It appears that the failure to file a 7-day C-4 report was the result of a lack of understanding of the requirements regarding expedited reporting deadlines prior to special elections, and SEIU 775 Ballot Fund did not intentionally withhold information prior to the February 11, 2025, special election, as demonstrated by filing the monthly C-4 report just three days after the 7-day C-4 report was due.

Based on our findings, staff has determined that, in this instance, failure to timely file a 7-day C-4 report does not amount to a violation that warrants further investigation.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, you are receiving a formal written warning concerning the failure to timely disclose expenditures prior to elections. Staff expect that you update your reporting schedule to include expedited reporting prior to the elections in which you are participating and to submit C-4 expenditure reports by the expedited deadlines in RCW 42.17A.235. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Any allegations regarding reporting by you for the February 2025 special election that are not otherwise addressed are also hereby dismissed.

The PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

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@pdc.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