



State of Washington
PUBLIC DISCLOSURE COMMISSION

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July 14, 2025

Delivered electronically to Abby Lawlor on behalf of Service Employees International Union 775 Quality Care Committee at lawlor@workerlaw.com

Subject: PDC Case 170419 regarding Service Employees International Union 775 Quality Care Committee

Abby Lawlor:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on April 1, 2025. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately disclose expenditures on C-4 reports.

Applicable Laws and 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 to file accurate campaign finance reports with the Public Disclosure Commission.

Background and Findings

- Service Employees International Union 775 Quality Care Committee (the Committee) is registered with the PDC for calendar year 2025 under the “Full Reporting” option.
- The complaint alleged that the Committee failed to timely disclose a \$31,166.50 expenditure on its February 2025 C-4 report.
- The Committee timely filed a C-4 report on March 3, 2025, disclosing activity covering February 1 to 28, 2025. The C-4 report failed to include all expenditures made during the reporting period.
- On March 18, 2025, the Committee amended its February 2025 C-4 report to add a \$31,166.50 expenditure made on February 28, 2025, to SEIU WA State Council PAC. The report was submitted eight days late.
- During the investigation, staff noted that SEIU WA State Council PAC timely disclosed receipt of the \$31,166.50 contribution made by the Committee.
- In her response, Abby Lawlor, legal counsel for the Committee, stated that her client had filed the original February 2-25 C-4 report early, on March 3, 2025, in advance of a planned vacation

by the person responsible for the filing. When the individual returned, they were made aware of the February 28 expenditure in question and immediately amended the C-4 report to reflect the addition.

- Ms. Lawler further stated her belief that RCW 42.17A.235(10) applies to the Committee's amendment and requested the complaint be dismissed.
- The complaint included a second allegation regarding missing sub-vender detail for a 2024 independent expenditure made in the state of Alaska. It is staff's opinion that this out-of-state independent expenditure did not require correction. Staff has dismissed this allegation.

Summary and Resolution

The Committee acted in good faith by submitting the amendment to the February 2025 C-4 report to include the February 28, 2025, expenditure omitted from the original submission. PDC staff appreciates the Committee's proactive approach to ensure compliance with its reporting obligations and its prompt attention. However, it is staff's opinion that because the Committee does not have contribution limits, the \$200 limit cited in RCW 42.17A.235(10)(c) applies to the Committee instead, and therefore the Committee does not qualify for the "safe harbor" provisions of subsection (10). Timely disclosure by the recipient of the expenditure in question, though, mitigates the potential harm to the public from the delay in reporting by the Committee.

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37-060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

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

Pursuant to WAC 390-37-060(1)(d), however, the Committee is receiving a formal written warning concerning the Committee's failure to timely disclose of all expenditures. The formal written warning will include staff's expectation that the Committee timely files all future required reports of contributions and expenditures. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen 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 Jennifer Hansen
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Conner Edwards