

[Anybodybutwheeler](#)

Sun, 27 Jul 2025 at 6:35 PM

To:"PDC Support" <pdcc@pdc.wa.gov>

External Email

Greetings,

The website in question is my personal blog which expresses personal opinions is exempt from campaign disclosure rules, pursuant [WAC 390-18-030](#), which states, in part:

“(2)(a) The following forms of advertising need not include the sponsor’s name...as otherwise required by RCW [42.17A.320](#) (1) and (2) and [42.17A.350](#)...

4) Political advertising created and distributed by an individual using their own modest resources is not required to provide the disclosures in RCW [42.17A.320](#)...

(ii) Disseminated on the individual's social media site, personal website, or an individual's similar online forum where information is produced and disseminated only by the individual.”

The [Public Disclosure Commission stated in PDC Interpretation No. 07-04](#) that it seeks to "follow the money", not to disincentivize individuals from participating in political speech.  
From

### **General Approach and Guiding Principles**

- The primary objective is to provide disclosure of campaign financing, while not affecting the free flow of political information provided online when the information is provided by individuals using their own modest resources.

The costs associated with operating the blog—including hosting and domain fees—are well below the monetary thresholds defined for campaign expenditures (\$200 or \$350, whichever the case), and thus qualify as "modest resources" as described in the PDC’s own guidance [posted here](#).

## Sponsors of Independent Expenditures

The new rules raise the thresholds for reporting independent expenditures (activity, often advertising, that supports or opposes a candidate and is made without the consultation or cooperation of the candidate) and electioneering communications (communications that clearly identify a candidate even if they don't outright support or oppose the candidate). Below are the new thresholds that will trigger [C-6 reporting](#). Keep in mind that activity by a PAC remains reportable on a C-4 at any level.

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### Sponsors of Independent Expenditures

	Current value	Value April 1
<b>Political advertising that qualifies as "Independent Expenditure" - Threshold for reporting (RCW 42.17A.260)</b>	<b>\$1,000</b>	<b>\$2,000</b>
▪ Limit for the value of volunteer campaign worker expenses exempted from threshold for "Independent Expenditure" (RCW 42.17A.005(30))	\$250	\$350
<b>Independent expenditure ("not otherwise reported") - Threshold for reporting (RCW 42.17A.255(2))</b>	<b>\$100</b>	<b>\$1,000</b>
▪ Independent expenditure ("not otherwise reported") - Threshold for including incidental volunteer expenses (RCW 42.17A.255(1))	>\$50	>\$200
▪ Independent expenditure ("not otherwise reported") - Threshold for itemized expenditures (RCW 42.17A.255(5))	>\$50	>\$200
<b>Electioneering Communication - Threshold for reporting (RCW 42.17A.005(21))</b>	<b>\$1,000</b>	<b>\$2,000</b>
▪ Electioneering communication - Threshold for itemized expenditures (RCW 42.17A.305)	>\$100	>\$200
<b>Contribution threshold for including a contributor's name in the Top 5 or Top 3 on a qualifying political ad (RCW 42.17A.350)</b>	<b>\$1,000</b>	<b>\$2,000</b>

Creating this blog was an act of individual expression in a small-town political climate where open criticism of elected officials can carry social or economic risk. Several community members declined to contribute out of concern for potential repercussions.

Requiring individuals to share their identity chills speech. I'll likely take my blog down rather than risk sharing my name, which is precisely the chilling of speech the Commission seeks to avoid.

For these reasons—supported by both the letter and intent of WAC 390-18-030 and PDC Interpretation 07-04—I respectfully request that the Commission dismiss case #176278. Compelling disclosure in this context would run contrary to established rules and the Commission's own commitment to protecting individual political expression.

Thank you,

ABW