



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Delivered electronically to info@seattledsa.org, lscrpnr@gmail.com, chrstphrwng@gmail.com, fernandomc.sea@gmail.com and cg.edwards53@gmail.com

Subject: PDC Case 158642 regarding Seattle Democratic Socialists of America

Dear Seattle Democratic Socialists of America:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards (the “Complainant”) on August 15, 2024. The complaint alleged that Seattle Democratic Socialists of America (the “Respondent”) violated RCW 42.17A.205, .235 and .240 by failing to register and report as a political committee. As evidence, the Complainant provided a list of in-kind contributions the Respondent made to a local ballot measure committee in 2023 and 2024 for election year 2024.

Applicable Laws and Rules

- [RCW 42.17A.005\(41\)](#) defines a “political committee” as “any person¹ (except a candidate or an individual dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.”
- [PDC Interpretation 07-02](#) sets forth guidelines and factors to be considered when determining whether an entity is required to register as a political committee, including the primary purpose test.
- [RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Political Committee Registration* (C-1pc report) within two weeks after it is 1) organized; or 2) first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier.

¹ “Person” includes “an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized.” [RCW 42.17A.005\(39\)](#).

- A political committee that selects the Full Reporting option on their C-1pc report is required to disclose contributions and expenditures to the PDC on C-3 reports and C-4 reports pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee’s election participation², and their financial activity.
- From early June through early November, C-3 reports are due weekly, instead of monthly, for political committees that are participating in the General Election. Furthermore, committees that are participating in an election are subject to an accelerated reporting schedule that includes pre- and post-election C-4 reports, regardless of financial activity.
- A committee may file monthly C-4 reports, due by the 10th day of the following month, for those months during which they are not participating in an election. The committee may delay the filing of these monthly reports until they have either received contributions or made expenditures that exceed \$750³ since the last such report filed. RCW 42.17A.235(3(a) and [WAC 390-05-400](#).

Background and Findings

- According to reports filed with the PDC by local ballot measure committee Raise the Wage Renton (RTWR), which were referenced in the complaint filed by Mr. Edwards, the Respondent made nearly \$37,000 in monetary and in-kind contribution expenditures to RTWR in 2023 and 2024 for election year 2024. Most of the expenditures made to RTWR were in the form of in-kind contributions of staff time/wages.
- PDC reports indicate the Respondent also made other election-related expenditures, including a \$500 monetary contribution to candidate Michael Westgaard in 2023, a \$950 in-kind contribution to candidate Shaun Scott in 2024⁴, and a \$4,000 monetary contribution to House Our Neighbors: Let’s Build Social Housing in 2024.
- The Respondent’s website states that they tend to avoid paper endorsements but, instead, “focus on [making] a smaller number of quality endorsements where we will actually commit significant chapter resources towards electing candidates or approving/defeating ballot initiatives.” The website also says they “consider electoral work, especially canvassing and phonebanking operations, as opportunities to build popular support for a larger socialist movement.” The Respondent also indicates that it has an Electoral Working Group that “focuses

² “Participation” means, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate or a committee for the purpose of supporting or opposing an election-related matter (e.g. ballot measure); 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate or ballot proposition; or 3) engages in an activity described in .005(38)(c), (d) or (e). [RCW 42.17A.005\(38\)](#).

³ Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

⁴ The \$950 in-kind contribution reported by Shaun Scott was for his use of the Respondent’s voter database, which was paid for by their parent organization and made available to their chapters for free. Since there was no cost to the Respondent associated with this non-monetary in-kind contribution, they were not required to report it as expenditure on their reports.

on recruiting, facilitating member endorsement, and supporting socialist candidates for local office.”

- The Respondent first responded to the complaint on September 10, 2024 and indicated their belief that they are not a political committee based on the guidelines provided in PDC Interpretation 07-02. The Respondent stated it is a 501(c)(4) social welfare organization primarily formed to 1) promote social welfare through support and advocacy of socially democratic issues on local, state and national levels; and 2) educate the public about the socially beneficial policies of the democratic socialist ideology. Their response went on to say:
 - While they are formed to promote a political ideology, this does not make them a de facto political committee.
 - Seattle Democratic Socialists of America (DSA) receives income from membership dues and solicits general donations to support the organization’s general activities and does not solicit contributions for the purpose of supporting or opposing candidates or ballot measures.
 - The Respondent made contributions (expenditures) to support candidates and ballot measures, but this is not their primary purpose. The organization said they made minimal contributions in 2021 and 2022 and are selective in expending their limited financial resources. They said: “Rather, we rely on the volunteer efforts from our membership to provide support for endorsed candidates and ballot measures.”
 - As of September 2024, the Respondent indicated that approximately 26% of their overall treasury expenditures in 2023 and 2024 were used to support Renton’s Raise the Wage campaign, a single ballot measure they supported because it aligned with their policies and ideology. They also endorse candidates and ballot measures that subsequently gain support from their membership and benefit from the efforts of their volunteers.
 - The Respondent indicated that all their electoral activities are transparent because they properly and timely notify political committees of contributions made to them, who in turn disclose the contributions received from the Respondent on their campaign reports.
- On November 12, 2024, the Respondent provided additional information and indicated that the most significant electoral expense they incurred in 2023 was for staff time. However, due to limited financial resources, the organization relies on the volunteer efforts of their membership to provide support for endorsed candidates and ballot measures. In 2023, one employee who worked approximately 20 hours a week spent 70% of their time on electoral activities related to the Raise the Wage Renton ballot initiative. The Respondent said their activities were significantly reduced in 2024 due to a budget deficit and they only had one employee in 2024 who was laid off in February of 2024. The Respondent reiterated their belief that they are not a political committee, as defined by statute, because they do not solicit contributions for the purpose of supporting or opposing candidates or ballot measures and their primary purpose is not to make expenditures for these purposes.

- An Initial Hearing (Case Status Review) was held for this case on December 3, 2024. The Respondent did not attend the hearing/review.
- PDC staff concluded that Seattle Democratic Socialists of America met the primary purpose test and was required to register as a Political Committee in 2023 and 2024 based upon its election-related expenditures, including monetary contributions made to candidates and committees, and in-kind contributions of staff time.
 - Seattle DSA indicated that 38% of its expenses in 2023, and 76% of its expenses in 2024, were election related. Although it's not the sole determining factor, when an organization spends more than 30% of its budget on election-related activities, this generally indicates that electoral political activities are one of its primary purposes (an organization may have several primary purposes).
 - PDC staff also looked at other factors, such as the content of Seattle DSA's stated goals and mission, whether electoral activity and/or a favorable outcome in an election would help Seattle DSA achieve or further its goals/mission, and what other means (besides electoral political activity) Seattle DSA used to achieve its stated goals/mission.
- On January 6, 2025, the Respondent first registered as a continuing political committee with the PDC for years 2023-2025 and selected the Full Reporting option on their C-1pc report (*Political Committee Registration*). The committee indicated their support for candidates Michael Westgaard⁵ and Shaun Scott, and three ballot measures in Seattle and Renton that were on the ballot in 2023-2025⁶.
- On January 9, 2025, the Respondent reached out to PDC staff to request help filing reports in their ORCA (Online Reporting of Campaign Activity) account, and additional time to disclose contributions and expenditures on C-3 and C-4 reports, which was granted. The committee indicated they had a large backlog of thousands of individual contributions across dozens of deposits, and hundreds of expenditures in 2023 and 2024 that needed to be reported.
 - In the ensuing months, the Respondent worked with PDC staff to accurately disclose their activity for 2023 and 2024 and completed their reports for 2023 and 2024 on April 13, 2025 and May 4, 2025 respectively.
- The Respondent reached out to PDC staff on March 30, 2025 and inquired about the process for forming a PAC, separate from the original committee, with its own bank account, to 1) deposit funds raised specifically for the purpose of supporting or opposing Washington State candidates and ballot measures; and 2) make expenditures for the above purpose. PDC staff responded on

⁵ The Respondent's support for Michael Westgaard consisted of providing access to its voter database, which was paid for by their parent organization and made available to their chapters for free. Since there was no cost to the Respondent associated with this non-monetary in-kind contribution, they were not required to report it as expenditure on their reports.

⁶ The Respondent's members supported Seattle's Prop. 1A in 2025 by volunteering, but the committee did not incur any reportable in-kind contributions or expenditures in support of this ballot measure.

April 16, 2025 and provided the Respondent with information regarding the available options and related reporting requirements. On May 14, 2025, the Respondent indicated that the original organization did not intend to provide any seed money for the new PAC.

- The Respondent encountered some delays in setting up their new political action committee but successfully registered the new PAC on October 1, 2025 under the name “Seattle DSA PAC (SDSA PAC).”
- The Respondent filed late reports disclosing the original committee’s contribution and expenditure activity for January-September of 2025 in October and November of 2025. Three reports for October 2025 were timely, based on a lack of General Election participation.
- The Respondent was cooperative throughout our investigation of the complaint, and took corrective action as needed. The committee registered and reported contributions received and expenditures made in 2023, 2024, and 2025, including, but not limited to, the nearly \$37,000 in monetary and in-kind contributions made to Raise the Wage Renton⁷ that were alleged in the complaint.
- The Respondent does not have any previous warnings/violation of PDC requirements.

Summary and Resolution

It appears the Respondent met the requirement to register as a political committee in 2023 and 2024 based upon the value of the monetary contributions and in-kind contributions of staff time/wages they made to various electoral causes. All but three of the committee’s C-3 and C-4 reports for 2023-2025 were filed late. The Respondent’s good faith misunderstanding regarding the factors that trigger the political committee registration requirement is a mitigating factor.

Seattle Democratic Socialists of America signed a *Statement of Understanding* (SOU) on November 9, 2025 and paid a \$450 civil penalty on November 10, 2025 in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.205, .235 and .240 for failing to timely register and report as a political committee in years 2023-2025. The \$450 penalty assessed resolves the allegations listed in the complaint.

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

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

Sincerely,

Endorsed by,

Electronically signed by Tabatha Blacksmith

Electronically signed by Peter Frey Lavallee

⁷ Several of these expenditures for compensation and payroll taxes were made through Paychex, which appears as the expenditure recipient on reports. For these entries, PDC staff instructed the committee to indicate in the description field that these expenditures included in-kind contributions of staff time made to Raise the Wage Renton.

Tabatha Blacksmith
Compliance Officer

Peter Frey Lavalley
Executive Director

cc: Conner Edwards