



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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February 25, 2026

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Subject: PDC Case 161183 regarding Kent Firefighters IAFF Local 1747 PAC sponsored by Kent Firefighters Local 1747

Dear Kent Firefighters IAFF Local 1747 PAC:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards and Glen Morgan on September 13, 2024, October 15, 2024, October 16, 2024, and April 16, 2025. The complaints alleged that Kent Firefighters IAFF Local 1747 PAC (the “Respondent”) violated RCW 42.17A.235 and .240 by failing timely and accurate disclose contributions and expenditures in election years 2023-2025.

Specifically, these four complaints collectively alleged the Respondent failed to do the following:

- Report legal fees incurred with a law firm in 2023 in response to PDC Case 139251;
- Timely file C-3 reports based on weekly reporting schedule in 2024, including a C-3 report dated 8/1/24;
- Accurately list complete contributor names and addresses on a C-3 reports in 2024, including a C-3 report dated 8/1/24;
- Timely file a 21-day pre-General C-4 report for election year 2024; and
- Sufficiently describe a reimbursed expenditure, dated 3/3/25, on a March 2025 C-4 report to include vendor name and address.

An allegation made in the first complaint regarding late pre- and post-Primary Election C-4 reports for 2024 was dismissed because the committee’s 2024 Primary Election C-4 reporting was previously addressed in PDC Case 159748. However, these findings nonetheless address weekly C-3 reports and pre- and post-General C-4 reports for 2024.

## Applicable Laws and Rules

- A political committee is required to register with the PDC by filing a *Committee Registration* (C-1pc report). A 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 participation<sup>1</sup>, and their financial activity.
- Per RCW 42.17A.235(2), a committee is required to file C-4 reports based on the following accelerated reporting schedule for each election in which they are participating:
  - On the 21st day and 7th day immediately preceding the date on which the election is held. The pre-election reports should disclose all contributions received and expenditures made as of the end of one business day before the date of the report.
  - On the 10th day of the first full month after the election. The post-election report should disclose all contributions received and expenditures made from the closing date of the last report filed through the last day of the month preceding the date of the report.
- Committees 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. RCW 42.17A.235(3)(a).
- Pursuant to RCW 42.17A.235(5), a committee is required to file C-3 reports on an accelerated weekly reporting schedule<sup>2</sup> beginning on the first day of the fifth month before the date of the General Election (e.g. June 1st) and ending on the date of the General Election, if they are participating in the General Election. The weekly C-3 reports should be filed each Monday and disclose bank deposits of monetary contributions made during the previous seven calendar days (Mon.-Sun.).
- A committee's C-3 report should disclose, but not be limited to, the name and address of each person<sup>3</sup> that contributed funds to the committee and the amount contributed. However, a person

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<sup>1</sup> "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\(38\)](#).

<sup>2</sup> The accelerated weekly C-3 reporting schedule for Special Elections begins on the first day of the fourth month preceding the date of the Special Election and ends on the date of that election.

<sup>3</sup> "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\(39\)](#).

who contributes no more than \$100<sup>4</sup> in the aggregate is not required to be identified in the report, and such contributions may be reported as a lump sum. RCW 42.17A.235(5) and .240(2)(c).

- Per RCW 42.17A.240(7), a committee's C-4 report should disclose, but not be limited to, the name and address of each person to whom an expenditure was made in the aggregate amount of more than \$200<sup>5</sup> during the period covered by the report, as well as the amount, date, and purpose of each expenditure. Person, as defined, includes a vendor.
- [RCW 42.17A.005\(15\)\(b\)\(viii\)](#) and [WAC 390-17-405\(2\)](#) state that an attorney may donate their professional services to a candidate, political party or caucus political committee under certain circumstances without it being considered a contribution.

### Background and Findings

- The Respondent is a Continuing Committee (Union) that first registered with the PDC in 2012. On the most recent C-1pc report (*Political Committee Registration*) filed by the Respondent prior to this complaint, they selected the Full Reporting option. The committee participated in the 2024 Primary and General Elections by virtue of making several contributions to candidates in those elections.
- On December 10, 2024, February 12, 2025, February 13, 2025, and February 19, 2025, the Respondent provided written responses by email to the allegations made in the complaints. These responses are summarized throughout this letter and appear in relation to the allegation to which they pertain.
- An Initial Hearing (Case Status Review) was held for this case on January 17, 2025, and was attended by the Respondent's legal counsel.
- The Respondent was cooperative throughout our assessment of the complaint and took corrective action as needed.
- The Respondent previously received a letter from PDC staff on October 11, 2024, reminding them to file reports based on the accelerated reporting schedule when they participate in a Primary Election. In the prior case (159748), the committee erroneously filed monthly C-4 reports instead of using the accelerated reporting schedule for 2024 Primary election participation.
- Although it is not a prior finding against the Respondent, a political committee they sponsored, Vote Yes on Proposition One, received a Warning letter on September 13, 2023 for failing to timely disclose used yard signs from a prior campaign as an in-kind contribution to that

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<sup>4</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$25 to \$100 effective April 1, 2023.

<sup>5</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

committee in 2023; this case against a different committee (139251) was nonetheless referenced in two of the complaints.

#### Allegation: Unreported Legal Fees (2023 & 2024)

One of the complaints in this case (161183) alleged the Respondent failed to report legal expenses on one or more C-4 reports that were incurred in 2023 while responding to a prior case (139251) against a committee they sponsored (Vote Yes on Proposition One). This allegation was based on the metadata for the response letter, dated July 17, 2023 and signed by Terry McCarten, which shows that it was authored by Michael White. The complaint alleged the letter's author, Michael Lee White, was a licensed attorney employed by Barnard Iglitzin & Lavitt LLP at the time the letter was written.

- In a letter dated February 13, 2025, the Respondent's legal counsel provided a formal written response regarding the allegation that they failed to timely and accurately disclose legal expenses:
  - The firm indicated that attorney Michael White no longer worked for them and was not a practicing attorney at the time he provided his services, free of charge and in his personal capacity, to IAFF Local 1747. They said the Respondent committee reasonably believed they were not required to report the estimated value of a non-practicing attorney as an in-kind contribution.
  - If the Respondent was in fact required to report the services provided by Mr. White, their attorney said this omission merits a dismissal, written reminder or alternate response pursuant to WAC 390-37-061 based on the presence of the following mitigating factors:
    - Noncompliance was the result of a good-faith omission or misunderstanding, was not intentional, and no one benefitted politically or economically from noncompliance;
    - Any impact of not reporting the fair market value of Mr. White's volunteer legal services on the public was minimal, and the unreported services were not election related; and
    - The Respondent indicated their belief that previous PDC case decisions suggest an apparent recognition by the agency that legal expenses related to PDC compliance and case handling are of limited public interest.
- Our research confirmed the law firm's claim the Michael White was not employed by Barnard Iglitzen & Lavitt LLP during the period the prior case (139251) was open, which was 7/5/23-9/13/23. According to publicly available records, Michael White has not been employed by the firm since July of 2022.
- Michael White's legal services were provided for the benefit of the Respondent in the prior case, which was Vote Yes on Proposition One, not Kent Firefighters. As a result, Kent Firefighters is

not required to disclose the value of the legal services Michael White provided to Vote Yes on Proposition One, and this allegation against Kent Firefighters is hereby dismissed.

- The complaint also speculated that the Respondent might have incurred legal expenses in 2024 when they responded to PDC Case 159748. However, that case was resolved with a reminder letter and there was no correspondence between the Respondent and PDC staff indicating that they engaged the services of an attorney in that matter. Absent any evidence to the contrary, the allegation regarding 2024 is also dismissed.

### Allegation: Late Reporting (2024)

The complaint allegations concerning late reporting for 2024 include failure to timely file 1) C-3 reports based on the 2024 weekly reporting schedule; and 2) a 21-day pre-General C-4 report.

#### **1. Weekly C-3 Reporting (2024)**

- The Respondent filed 17 C-3 reports for election year 2024. Of those 17 reports, four were not timely, based on the weekly C-3 reporting schedule in effect from 6/3/24-11/4/24. The four C-3 reports for deposits made on 7/1/24, 8/1/24, 8/15/24 and 8/30/24 were filed 4-31 days late, and disclosed several small contributions of between \$1 and \$25 that appear to be payroll deductions.
  - The C-3 report for the committee's 8/1/24 deposit was due the day before the Primary Election but filed after the election, as alleged in the complaint.

#### **2. 21-day pre-General C-4 Report (2024)**

- Despite its General Election participation, the committee filed monthly C-4 reports for September and October of 2024 on September 30, 2024 and October 28, 2024, instead of the 21-day pre-General C-4 report (covering 9/1/24-10/14/24) that was due on October 15, 2024 and the 7-day pre-General C-4 report (covering 10/15/24-10/28/24) that was due on October 29, 2024.
- On February 19, 2025, the Respondent's legal counsel replied in writing regarding their client's failure to use the accelerated C-4 reporting schedule for a committee participating in the 2024 General Election. They requested an alternative resolution in lieu of a brief or full enforcement hearing based on the following mitigating factors:
  - The committee mistakenly believed they could return to monthly reporting after the 2024 Primary Election based upon language that appeared in the reminder letter issued by PDC staff in PDC Case 159748, which specifically reminded them to adhere to the accelerated reporting schedule when participating in a Primary Election. The reminder letter did not alert the committee to take the same action for a General Election. This led to a good-faith misunderstanding by the volunteer responsible for the committee's reporting, who now has a fuller understanding of the requirement. The response said the committee is committed to fully reporting moving forward.

- The Respondent said that noncompliance was not intentional, the impact on the public was minimal, and no one benefitted politically or economically from noncompliance.
- Three additional mitigating factors applied in this situation:
  - All the Respondent's expenditures for the 21-day reporting period (9/1/24-10/28/24) were made on September 30, 2024 and disclosed the same day on a monthly September C-4 report, making the information available to the public before the General Election and two weeks earlier than it would have been if it had been disclosed on the 21-day pre-General C-4 report. No contributions received (deposits) were reported for September.
  - The committee did not report any expenditures for October. All the contributions they received (deposits) for the 21-day reporting period (9/1/24-10/28/24) occurred on October 15, 2024 and were timely disclosed on both C-3 reports and a monthly October C-4 report that was filed on October 28, 2024. These reports made the information available to the public before the General Election, and the same day that a 7-day pre-General C-4 report would have been due.
  - The October 11, 2024 reminder letter in PDC Case 159748 was issued after the Respondent submitted a September monthly C-4 report on September 30, 2024, and the committee therefore did not have the benefit of PDC staff guidance when they filed the September report.

The remainder of the Respondent's C-3 and C-4 reports for 2024 not otherwise mentioned herein were timely filed.

2025 Reporting: One C-3 report for a deposit dated 10/30/25 was filed 41 days late. The committee's remaining C-3 reports, and all of their C-4 reports for 2025, were timely filed.

Allegation: Inaccurate or Incomplete Reporting (2024 & 2025)

The complaints alleged the Respondent failed to 1) timely & accurately disclose contributor names & addresses on C-3 reports in 2024, including a C-3 report dated 8/1/24; and 2) sufficiently describe a reimbursed expenditure on their March 2025 C-4 report.

**1. Contributor Names/Addresses (2024)**

- On December 10, 2024, the committee's Treasurer responded by email, addressing the allegation concerning disclosing complete contributor names and accurate contributor addresses on C-3 reports in 2024:
  - The Respondent said 1) they receive voluntary contributions from over 300 members that live in Washington State, Oregon, Montana and Hawaii on a monthly basis; 2) attempting to maintain a record of all their current physical addresses is impractical and unnecessary; and 3) correspondence sent to any of their contributing members via the committee's PO Box in Kent, WA will reach the intended recipient.

- The committee stated that their practice of entering a first initial and full last name for contributors on the C-3 report is a time-saving measure that makes the auto-populate feature in the ORCA (Online Reporting Campaign Activity) platform faster and easier to use. They said there is “nothing nefarious” going on, that completing a C-3 report for over 300 contributors can take two hours and welcomed any shortcut suggestions.
- The Respondent indicated their belief that RCW 42.17A.240(2) is vague and said they would continue to enter the Kent address and first initials for contributors on C-3 reports until they are directed by the Commission to cease this practice or the statute is amended.
- In late January 2025, PDC staff learned that the committee had selected a feature in ORCA that itemized all contributions on C-3 reports, even when it was not required. The Respondent inquired about the C-3 disclosure requirements for contributors who gave \$100 or less and PDC staff confirmed that full contributor name and address are only required on the C-3 report for those contributors that gave more than \$100 in the aggregate to the committee.
- On February 10, 2025 and December 12, 2025, the Respondent amended 20 C-3 reports from 2024, including those that lacked the contributor’s full name and/or address. These reports, including the C-3 report for 8/1/24 that was alleged in the complaint, were amended to disclose missing contributor details for individuals who donated more than \$100 in the aggregate to the committee. The remaining contributors, who gave less than \$100 in the aggregate, did not need to be itemized in reports to show their full names and addresses.
- In a letter dated February 12, 2025, the committee’s legal counsel provided a formal written response regarding the allegation of incomplete contributor name and inaccurate contributor address on 2024 C-3 reports:
  - The Respondent indicated that over 90% of the individuals listed on their C-3 report dated 8/1/24 contributed less than \$100. The committee went on to explain that only 23 out of 277 individual contributors listed in the report made aggregate contributions of more than \$100, which triggered the requirement to disclose their identities on reports as set forth in RCW 42.17A.240(2)(c).
  - The committee indicated their belief that this matter merits a dismissal, written reminder or alternate response pursuant to WAC 390-37-061 based on the presence of the following mitigating factors:
    - The impact of noncompliance on the public was minimal, and the public was better informed with partial information than they would have otherwise been, if all the aggregate contributions of \$100 or less had not been itemized on the report as is permitted by statute;
    - They took remedial measures by amending their C-3 report dated 8/1/24; and

- Noncompliance was the result of a good-faith error, omission or misunderstanding, was not intentional, and no one benefitted politically or economically from noncompliance.

## **2. Reimbursed Expenditure Description (2025)**

- The monthly March C-4 report filed by the Respondent on April 10, 2025 (report 110279776) disclosed reimbursement for a \$3,444.23 expenditure dated 3/3/25 for a “Charity Hockey Game” but failed to include the name and address of the vendor.
  - The March C-4 report was amended on April 23, 2025 to include name and address of the vendor, the Seattle Thunderbirds.

### Summary and Resolution

As stated herein, several mitigating factors apply to the allegations and findings in this case.

To summarize:

- The late C-3 report dated 8/1/24 that was filed after the election is partially mitigated by the small dollar amounts reported, which were payroll deductions. The other three C-3 reports, which were 4-18 days late and did not deprive the public of information before an election, likewise contained payroll deduction contributions.
- For the reasons stated herein, your submission of monthly C-4 reports in lieu of pre-General C-4 reports in 2024 did not deprive the public of information prior to the election due to the mitigating timing and content of other reports.
- Your committee remedied their contributor name and address omissions on 2024 C-3 reports and amended the vendor name and address for a reimbursed March 2025 expenditure, which resolved those matters.
- The allegations concerning your unreported legal fees were dismissed.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely and accurately disclose all contributions and expenditures in 2024 and 2025. PDC staff expect you to timely and accurately file all required reports of contributions and expenditures in the future, especially during the time-sensitive period before an election in which your committee participates. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is also reminding you about the importance of disclosing vendor name and address for a reimbursed expenditure on the C-4 report. PDC staff expect you to disclose all required vendor details for expenditures in the future, in accordance with the PDC laws, rules or guidance.

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](mailto:pdc@pdc.wa.gov).

Sincerely,

Endorsed by,

*Electronically signed by Tabatha Blacksmith*

Tabatha Blacksmith

Compliance Officer

*Electronically signed by Peter Frey Lavallee*

Peter Frey Lavallee

Executive Director

cc: Conner Edwards and Glen Morgan