



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112 • Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

August 6, 2026

Sent electronically by email to:

Dan Brady, attorney for Rachel Best-Campbell: dan@danbradylaw.com

John Meader: john.meader@atg.wa.gov

Susie Giles-Klein: Susie.GilesKlein@atg.wa.gov

Rachel Best-Campbell
19320 160th Ave NE
Woodinville, WA 98072

Subject: Commission Final Order, Rachel Best-Campbell, PDC Case 181167

Dear Rachel Best-Campbell:

Enclosed is a copy of the Public Disclosure Commission's Final Order Imposing Fine entered in the above-referenced case. At its July 23, 2026 meeting, the Commission found you in violation of RCW 42.17A.320¹, RCW 42.17A.145 and RCW 42.17A.240 and assessed a total civil penalty of \$3,800 with \$1,900 suspended on the conditions set forth in the Final Order.

Please submit the payment in accordance with the Final Order:

- Electronic Payment (processing fees apply). Once requested, PDC staff will email a payment link. You must send the payment, via the link.
- For Regular Mail: Public Disclosure Commission PO Box 40908 Olympia, WA 98504-0908

Sincerely,

/s/ Electronically signed

Alice Fiman

Alice Fiman

Compliance Manager

Enclosure: Final Order for Rachel Best-Campbell, PDC Case 181167

¹ Effective Jan. 1, 2026, Chapter 42.17A RCW was recodified to Title 29B RCW. Because the events at issue in this case occurred in 2025, this document cites to Chapter 42.17A.

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7 **BEFORE THE PUBLIC DISCLOSURE COMMISSION**
8 **OF THE STATE OF WASHINGTON**
9

10 In re the Matter of Enforcement Action
11 Against:

PDC CASE NO. 181167

12 RACHEL BEST-CAMPBELL,

FINAL ORDER

13
14 Respondent.
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17 **I. INTRODUCTION**

18 This matter was heard by the Washington State Public Disclosure Commission
19 (Commission) on July 23, 2026, by in-person, telephonic, and online streaming access. The
20 hearing was held in accordance with Chapters 34.05 and 42.17A RCW¹, and Chapter 390-37
21 WAC.

22 Commissioners present in-person were J. Robert Leach, Commission Chair (presiding),
23 Douglass North, Commission Vice-Chair, and Commissioner Matthew Segal. Commissioner
24 Teebah Alsaleh was present online. Also present in-person were Assistant Attorneys General
25

26 ¹ Chapter 42.17A RCW was recodified to Title 29B RCW effective January 1, 2026. Citations in the
order refer to the statute in effect at the time of the alleged violations.

1 John S. Meader and Amanda Migchelbrink representing the Commission, Assistant Attorney
2 General Susie Giles-Klein representing PDC Staff, and Alice Fiman, Compliance Manager.
3 Notice was provided to the Respondent and she appeared along with her Counsel, Dan Brady.
4 The proceeding was open to the public and recorded.

5 The hearing concerns allegations that the Respondent violated RCW 42.17A.320 by
6 failing to provide sponsor identification on campaign advertising, and RCW 42.17A.145 and
7 .240 for failing to file complete and correct contribution (C-3), and expenditure (C-4), reports.

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9 The Commissioners had before them the following materials:

- 10 • Second Amended Notice of Administrative charges, PDC Case No. 181167,
11 dated July 15, 2026, and signed by Executive Director Peter Lavallee;
- 12 • Enforcement Notice for a July 23, 2026, full hearing before the Commission.
- 13 • Report of Investigation for Case 181167, prepared by Alice Fiman, Compliance
14 Manager, dated June 3, 2026, which included:
 - 15 ○ Respondent's PDC campaign finance reported independent expenditures;
 - 16 ○ Respondent's PDC campaign finance reported contributions and
17 expenditures;
 - 18 ○ Complaint submitted to the PDC on November 2, 2025;
 - 19 ○ Screenshot of a YouTube account identified as associated with the
20 Respondent;
 - 21 ○ Responses to the complaint by the Respondent;
 - 22 ○ Summary Expenditure Report (C-4) submitted to the PDC for the
23 Respondent's Woodinville campaign covering June 1 to July 14, 2025;
 - 24 ○ Screenshots of the official 2025 Woodinville City Council Campaign
25 website for Rachel Best-Campbell;
 - 26 ○ Summary Expenditure Report (C-4) submitted to the PDC for the Rachel

- 1 Best-Campbell for Woodinville campaign covering July 29, to August 31,
2 2025;
- 3 ○ Summary Expenditure Report (C-4) submitted to the PDC for the Rachel
4 Best-Campbell for Woodinville campaign covering September 1, to
5 October 13, 2025;
 - 6 ○ Cash Receipts Monetary Contributions Report (C-3) submitted to the
7 PDC for Rachel Best-Campbell for Woodinville campaign covering
8 August 22, 2025;
 - 9 ○ Cash Receipts Monetary Contributions Report (C-3) submitted to the
10 PDC for Rachel Best-Campbell for Woodinville campaign covering June
11 16, 2025;
 - 12 ○ Washington State Department of Revenue business lookup for Ruta
13 Fulfillment, LLC.
- 14
- 15 • Proposed Stipulation as to Facts and Violations submitted by the parties and signed on July
16 14, 2026, by Dan Brady, Counsel for the Respondent, and by Peter Lavallee, Executive
17 Director for the PDC.
- 18

19 II. STIPULATION

20 The parties jointly submitted a signed Stipulation as to Facts and Violations (Stipulation).
21 Ms. Giles-Klein presented the Stipulation, reviewed the aggravating and mitigating factors,
22 summarized the facts and violations recommended by PDC Staff, and asked the Commission to
23 accept the Stipulation. Mr. Brady was available for questions and confirmed the information
24 provided by Ms. Giles-Klein. The Respondent took responsibility and asked the Commission to
25 accept the Stipulation. The Commission voted 4-0 to accept the Stipulation as submitted. The
26 parties did not stipulate as to what civil penalties are appropriate.

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III. FINDINGS OF FACT

1. The Respondent, Rachel Best-Campbell, was a Woodinville City Council member from June 18, 2019, to December 21, 2025. She was elected to Woodinville City Council Position 3 in 2021 and ran unsuccessfully for re-election in the 2025 general election. Respondent has no prior violations with the PDC.

2. The Commission accepts the stipulation of the parties as to the facts in this matter and incorporates by reference the facts in the stipulation describing the case Background; Failure to Provide Sponsor ID on Facebook Ad; and Failure to Accurately File Contribution (C-3) and Expenditure (C-4) Reports.

IV. CONCLUSIONS OF LAW

1. The Commission has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure law; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC.

2. The Commission accepts the stipulation of the parties that the Respondent violated RCW 42.17A.320 by failing to provide sponsor identification on campaign advertising, and that the Respondent violated RCW 42.17A.145 and RCW 42.17A.240 by failing to file complete and correct contribution (C-3) and expenditure (C-4) reports.

3. Mitigating factors in this case are: the Respondent acted with the intent to fully disclose expenditures although it was not done completely or correctly; this is the Respondent's first violation; the Respondent cooperated with the PDC's investigation.

4. Aggravating factors in this case are: the incorrect reports denied the public access to information during a time-sensitive period before the election; Respondent was a well-funded, repeat candidate with experience reporting to the PDC; the Respondent did not contact the PDC for guidance about reporting these expenditures.

V. ORDER

Based upon the stipulated Findings of Fact and Violations, and the Commission's Conclusions of Law, the Commission assesses a civil penalty of \$200 for failure to provide sponsor identification on advertisements, with \$100 suspended. The Commission further assesses a \$3,600 civil penalty for failure to file complete and accurate C-3 and C-4 reports, with \$1,800 suspended. The suspended amounts for each violation are subject to the following conditions:

1. a. The non-suspended portion of the penalty for failure to provide sponsor identification (\$100) is paid by the Respondent within 30 days of the date of the Final Order. If the Respondent fails to make timely payment of the non-suspended portion of the penalty, the total penalty of \$200 shall become due.

b. The non-suspended portion of the penalty for failure to file complete and accurate C-3 and C-4 reports (\$1,800) is paid by the Respondent within 30 days of the date of the Final Order. If the Respondent fails to pay the non-suspended portion of the penalty, the total penalty of \$3,600 shall become due.

1 c. If the Respondent fails to make timely payment of the non-
2 suspended portion of a penalty the full amount of that penalty may be
3 sent to collection or brought to Superior Court as allowed by law
4 without further action by the Commission.

5
6 2. The Respondent remains in full compliance with all PDC reporting
7 requirements and is not found to have committed any further violations
8 of Chapter 42.17A RCW or Title 390 WAC within four years of the date
9 of this Final Order. The suspended penalty shall not be assessed based
10 solely upon any remediable violation, minor violation, or error classified
11 by the Commission as appropriate to address by a technical correction.
12

13 So ORDERED this 6th day of August, 2026.

14
15 WASHINGTON STATE PUBLIC
DISCLOSURE COMMISSION

16 FOR THE COMMISSION:

17 J. Robert Leach

18 J. Robert Leach (Aug 5, 2026 14:33:31 PDT)

19 J. Robert Leach,
Chair, Public Disclosure Commission

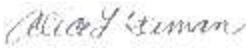
20
21 *Copy of this Order mailed and/or emailed to:*

22 Rachel Best-Campbell
23 19320 160th Ave. NE
Woodinville, WA 98072
C/O Dan Brady, Attorney for Respondent,
24 dan@danbradylaw.com

25 Alice Fiman,
PDC Compliance Manager,
26 pdc@pdc.wa.gov

1 Susie Giles-Klein,
2 Assistant Attorney General for PDC Staff,
3 Susie.giles-klein@atg.wa.gov.

4 I, Alice Fiman, certify that I mailed and/or emailed a copy of this order to the
5 Respondent/ Applicant at his/her respective address postage pre-paid on the date stated
6 herein.

7  Aug 6, 2026
8 Signed _____ Date _____

9 **NOTICE: RECONSIDERATION**

10 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a Petition for
11 Reconsideration with the PDC within ten (10) days from the date this Final Order is served upon
12 you. Any Request for reconsideration must state the specific grounds for the relief requested.
13 Petitions must be electronically mailed to the Washington State Public Disclosure Commission,
14 711 Capitol Way, Room 206, Box 40908, Olympia WA 98504-0908, pdc@pdc.wa.gov.

15 **NOTICE: PETITION FOR JUDICIAL REVIEW**

16 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for
17 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final
18 Order must be filed with the court and also served upon both the Commission and the Office of
19 the Attorney general within thirty (30) days after the date this Final Order is served upon you.
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