



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action Against

Rachel Best-Campbell, Respondent

PDC Case 181167

Amended Notice of Administrative
Charges

I. JURISDICTION

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Title 29B RCW¹, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC.

II. ALLEGATION(S)

PDC Staff alleges that the Respondent, Rachel Best-Campbell, violated: (1) RCW 42.17A.320 by failing to provide sponsor identification on campaign advertising; and/or (2) RCW 42.17A.445 and WAC 390-16-238 by expending campaign funds for personal use not directly related to her 2025 campaign; and/or (3) RCW 42.17A.145 and RCW 42.17A.240 by failing to file complete and correct contribution (C-3) and expenditure (C-4) reports.

III. FACTS

1. Rachel Best-Campbell was a Woodinville City Council member from June 18, 2019, to December 21, 2025.

¹ NOTE: 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 Notice uses the citations to Chapter 42.17A.

2. Ms. Best-Campbell was elected to Woodinville City Council Position 3 in 2021 and ran for re-election in 2025, but lost in the general election that year.
3. During her 2025 campaign for Woodinville City Council, Ms. Best-Campbell reported \$125,446.71 in contributions and \$125,446.71 in expenditures.
4. All contributions were reported as received from Ms. Best-Campbell and her spouse, Alex Campbell.
5. On November 2, 2025, PDC Staff received a complaint against Ms. Best-Campbell that included an advertisement from Facebook for a campaign event called “Peace, Love and Woodinville.” The advertisement stated that the event was “[i]n collaboration with KEXP and Rachel Best-Campbell.”
6. Ms. Best-Campbell’s campaign was the original source of payment to the entity who sponsored the “Peace, Love and Woodinville” event. No sponsor identification was listed in the advertisement.
7. The campaign reported two separate \$25,000 contributions from Ms. Best-Campbell, contributed June 16, 2025 and Aug. 22, 2025. On those same dates, the campaign reported two expenditures for the same amounts. Specifically:
 - On June 16, 2025, the Campaign reported a \$25,000 expenditure to Ruta Fulfillment LLC with an expenditure description of “Event sponsorship fee.” This expenditure was for sponsorship of “Woodinville Summer Family Day.”
 - On August 22, 2025, the Campaign reported a \$25,000 expenditure to Ruta Fulfillment LLC, with an expenditure description of “Event sponsorship fee - Book Launch.”
8. Ms. Best-Campbell confirmed that the campaign expenditures described above were for personal events unrelated to her 2025 Woodinville City Council campaign.
9. In the alternative, if Ms. Best-Campbell did not use campaign funds to facilitate these non-campaign related events, then her Campaign filed misleading and/or inaccurate C-3 and C-4 reports when it certified contributions and expenditures made June 16 and Aug 22, 2025 as being campaign-related.

IV. LAW

RCW 42.17A.005(47)(a) Defines “sponsor” as the person who pays for the political advertising. If a person acts as an agent for another or is reimbursed by another for the payment, the original source of the payment is the sponsor.

RCW 42.17A.145 requires that every report and statement required to be filed under this chapter shall identify the person preparing it, and shall be certified as complete and correct, both by the person preparing it and by the person on whose behalf it is filed.

RCW 42.17A.240 similarly requires that each report required under RCW 42.17A.235 (1) through (4) must be certified as correct by the treasurer and the candidate.

RCW 42.17A.240 requires committees file accurate campaign finance reports with the Public Disclosure Commission

RCW 42.17A.320 sets forth the size and placement requirements for identifying the sponsor of political advertising.

RCW 42.17A.445 describes when the use of campaign funds for personal use is allowed by a candidate. Pursuant to RCW 42.17A.445, contributions may only be paid to a candidate, or a treasurer or other individual or expended for such individual's personal use under certain outlined conditions.

WAC 390-16-238 further outlines restrictions and requirements for the personal use of contributions. WAC 390-16-238(2) states an expenditure of a candidate's campaign funds will be considered personal use if it fulfills or pays for any commitment, obligation or expense that would exist irrespective of the candidate's election campaign.

RESPECTFULLY SUBMITTED this 3rd day of June 2026.

/s/ Electronically Signed

Peter Frey Lavalley
Executive Director