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

November 24, 2026

Delivered electronically to kshipman@wsab.org

Subject: PDC Order, Case 191593

Dear Virginia Mason Franciscan Health,

Enclosed is a copy of the Public Disclosure Commission's Order Imposing Fine that was entered in the above-referenced case.

At the October 28, 2026 Brief Enforcement hearing, the Presiding Officer assessed a total civil penalty of $500, of which $250 is suspended, in accordance with WAC 390-37-143. The $250 non-suspended penalty is payable within 30 days of the date of this Order, which is December 28, 2026.

Online Payment Option:
To make an online payment, respond to the email accompanying this order requesting a payment link.

A payment link will be sent to you, in which you will need to provide the following information: (1) Case Number; and (2) Respondent Name. Processing fees may apply.

To mail a check or money order, make it payable to the "Washington State Treasurer" and be sure to include the PDC Case Number in the memorandum field.

For Regular Mail:
Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

For Overnight Mail or In-Person Delivery:
Public Disclosure Commission
711 Capitol Way S, STE 206
Olympia, WA 98501-1267

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at pdc@pdc.wa.gov.

Sincerely,

Electronically Signed by Ashley Joslyn
PDC Staff

Enclosure: Initial Order

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with Title 29B RCW Virginia Mason Franciscan Health, Respondent.	PDC Case 191593 Findings of Fact, Conclusions of Law, and **Order Imposing Fine**

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to Virginia Mason Franciscan Health on October 9, 2026, a brief adjudicative proceeding was held on October 28, 2006, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 29B.50.080 by failing to timely file the Lobbyist Employer's Annual Report (L-3 report) as an employer of a lobbyist for the calendar year 2025. The L-3 reports, disclosing activity during the preceding calendar year for 2025, was due to be filed not later than March 2, 2026.

The hearing was held in accordance with Chapter 34.05 RCW, Title 29B RCW and Chapter 390-37 WAC. Commission Chair J. Leach was the Presiding Officer. The Commission staff was represented by Compliance Coordinators Carolyn Jones and Ashley Joslyn. The Respondent participated in the hearing through Microsoft teams or via written testimony.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent was a lobbyist employer in the State of Washington during calendar year 2025.

2. As a lobbyist employer, the Respondent was required to file the L-3 report by March 2, 2026.

3. The Respondent filed the L-3 report prior to the hearing.

4. The Respondent has no prior violations.

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.

2. The Respondent violated RCW 29B.50.080 by failing to timely file the L-3 report by March 2, 2026.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED that the Respondent is assessed a civil penalty of $500 in accordance with the L-3 penalty schedule set forth in WAC 390-37-143.**

2. **It is further ordered that $250 of the $500 penalty is suspended on the following conditions:**

   a. **The Respondent does not commit any further violations of Title 29B RCW or Title 390 WAC within four years of the date of this Order. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction.**

   b. **The Respondent pays the $250 non-suspended civil penalty within 30 days of the date of this Order.**

3. **It is further ordered that, if the Respondent fails to comply with any of the above conditions:**

   a. **The full $500 penalty shall immediately become due without further action by the Commission and PDC Staff is directed to refer the matter to collections and/or commence other legal proceedings as authorized by RCW 29B and 390 WAC.**

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 24th day of November, 2026.

Public Disclosure Commission

Electronically Signed Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

I, Ashley Joslyn, certify that I emailed a copy of this order to the Respondent at their email of record on the date stated herein.

Electronically Signed Ashley Joslyn — Signed
November 24, 2026 — Date

REVIEW OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).

- All requests for review must be submitted electronically to pdc@pdc.wa.gov.

- **REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE DATE THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.**

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. See WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER REVIEW RIGHTS – SUPERIOR COURT

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If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the final order. *See* WAC 390-37-142(7).

YOU HAVE THE RIGHT TO REQUEST JUDICIAL REVIEW OF A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.