# 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**


September 4, 2026

Also delivered electronically to: VoteBro2025@gmail.com

Subject: F-1 Enforcement Hearing Notice; PDC Case Number **195371**

Dear Keri Bro:

The Public Disclosure Commission (PDC) has not received your Personal Financial Affairs Statement (F-1 report) disclosing financial activities for calendar year 2025. RCW 29B.55.010 requires every elected or appointed official to file an F-1 report, which was to have been filed no later than April 15, 2026.

Pursuant to RCW 29B.55.010, as an elected or appointed official during all or part of 2025 you are required to file the *Personal Financial Affairs Statement* (F-1 report) covering the calendar year 2025. As of now, the PDC has not received your F-1 report disclosing financial activities for calendar year 2025. RCW 29B.55.010 requires every elected or appointed official to file an F-1 report, which was to have been filed no later than April 15, 2026.

In accordance with RCW 29B.55.010 and RCW 29B.60.020, an Adjudicative Proceeding (Enforcement Hearing) has been scheduled to determine if you violated RCW 29B.55.010 as an elected or appointed official by failing to file the F-1 report covering calendar year 2025. Under the Enforcement Hearing rules, the Commission has the authority to assess a civil penalty in accordance with WAC 390-37-182, the Enforcement Hearing penalty schedule adopted by the Commission.

## HEARING INFORMATION

| | |
|---|---|
| Date and time: | **September 24, 2026, at 9:30AM** |
| Place: | Via Teams, Live Audio and Online Transmission |
| Presiding Officer: | Public Disclosure Commission |
| Authority: | RCW 29B and WAC 390 |

## PARTICIPATING VIA MICROSOFT TEAMS

The Enforcement Hearing will be audio and video recorded. The Commissioners and PDC staff will join the meeting remotely via Microsoft Teams videoconferencing platform.

Anyone wishing to participate in the hearing remotely must follow the instructions below and join the meeting on a computer or mobile app **promptly at 9:20AM on September 24, 2026**. Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave or stay in the meeting.

*Please note that you must stay muted at all times except while your case is being heard.*

**Join on your computer or mobile app:**

https://tinyurl.com/4a82buva

If you are unable to use Teams or experience technical difficulties, please call the PDC's main number 1-360-753-1111 to obtain information regarding alternate participation by telephone.

**INTERPRETER**

If a party or witness to this proceeding speaks limited English or is hearing-impaired, and needs an interpreter, a qualified interpreter will be appointed at no cost to you. Please inform us at least five business days before the hearing or no later than September 17, 2026, if you require an interpreter for this proceeding and/or translation of its written materials in a language other than English. Please contact us by email at pdc@pdc.wa.gov or call us at (360) 753-1111 or 1-877-601-2828 to request an interpreter.

**SUBMITTING WRITTEN MATERIALS**

In advance of the Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Commission, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by no later than **September 21, 2026**.

**SUBMITTING F-1 REPORTS**

You are strongly encouraged to complete and submit the required report online prior to the Enforcement Hearing, so it is received by the PDC no later than September 21, 2026.

The reports must be submitted electronically. Instructions for filing the F-1 can be found here. https://www.pdc.wa.gov/registration-reporting/personal-financial-affairs-disclosure/completing-f-1.

If you have any questions about the hearing process prior to the hearing date, please contact PDC Staff by email at pdc@pdc.wa.gov – and be sure to reference your case number in the subject line of the email.

Sincerely,

PDC Staff
Compliance and Enforcement Division

Public Disclosure Commission
Shining Light on Washington Politics Since 1972

Enclosures

- PDC Penalty Schedule

**Penalty Schedule** [WAC 390-37-182]**:**

**Penalty factors (full adjudicatory proceedings).**

(1) In assessing a penalty after a full adjudicatory proceeding, the commission considers the purposes of chapter **Title 29B** RCW, including the public's right to know of the financing of political campaigns, lobbying and the financial affairs of elected officials and candidates as declared in the policy of RCW **29B.05.010;** and, promoting compliance with the law. The commission also considers and applies RCW **29B.60.020** and may consider any of the additional factors described in subsection (3) of this section.

(2) Under RCW **29B.60.020,** the commission:

(a) May waive a penalty for a first-time violation;

(b) Must assess a penalty for a second violation by the same person or individual, regardless if the person or individual committed the violation for a different political committee;

(c) Must assess successively increased penalties for succeeding violations pursuant to the following schedule:

| **Violations:** | | | |
|---|---|---|---|
| **Respondent failed to file or timely file an accurate or complete: (1) Statement of Financial Affairs (F-1 Report) / (2) Candidate Registration / (C-1 Report) / (3) Lobbyist Monthly Expense Report (L-2 Report) / (4) Lobbyist Employer Annual Report (L-3 Report) and (5) Local Treasurer's Annual Report (T-1 Report).** | | | |
| | **1st Occasion** | **2nd Occasion** | **3rd Occasion** |
| Filed missing report after being notified about the complaint. | **$0 - $1,000** | **$1,000 - $2,500** | **$2,500 - $5,000** |
| Report is filed late and is incomplete or inaccurate. | **$0 - $2,000** | **$2,000 - $5,000** | **$5,000 - $7,500** |
| Failed to file missing report by date of enforcement hearing. | **$0 - $3,000** | **$3,000 - $7,500** | **$7,500 - $10,000** |

[Excerpt above]

(3) In addition to the requirements of RCW **29B.60.020**, the commission may consider the nature of the violation and any relevant circumstances, including the following factors:

(a) The respondent's compliance history, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;

(b) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period, or otherwise had a significant or material impact on the public;

(c) Sophistication of respondent or the financing, staffing, or size of the respondent's campaign or organization;

(d) Amount of financial activity by the respondent during the statement period or election cycle;

(e) Whether the noncompliance resulted from a knowing or intentional effort to conceal, deceive or mislead, or violate the law or rule, or from collusive behavior;

(f) Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;

(g) Whether the respondent or any person, including an entity or organization, benefited politically or economically from the noncompliance;

(h) Personal emergency or illness of the respondent or member of his or her immediate family;

(i) Other emergencies such as fire, flood, or utility failure preventing filing;

(j) PDC staff or equipment error, including technical problems at the PDC preventing or delaying electronic filing;

(k) The respondent's demonstrated good-faith uncertainty concerning staff guidance or instructions;

(l) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention (e.g., filing missing reports, amending incomplete or inaccurate reports, returning prohibited or overlimit contributions);

(m) Whether the respondent is a first-time filer;

(n) Good faith efforts to comply, including consultation with PDC staff prior to initiation of enforcement action and cooperation with PDC staff during enforcement action, and a demonstrated wish to acknowledge and take responsibility for the violation;

(o) Penalties imposed in factually similar cases; and

(p) Other factors relevant to a particular case.

(4) The commission may consider the factors in subsections (1) through (3) of this section in determining whether to suspend a portion or all of a penalty upon identified conditions, and whether to accept, reject, or modify a stipulated penalty amount recommended by the parties.

(5) Notwithstanding the above schedule, the commission may assess a penalty of up to ten thousand dollars per violation, or a greater amount if agreed to by the parties, pursuant to RCW **29B.60.020**, based on the aggravating factors set forth in subsections (1) through (3) of this section.

(6) The penalty schedule for brief enforcement proceedings is provided under WAC **390-37-143**.

[Statutory Authority: RCW **29B.20.030**(1), 2019 c 428, and 2019 c 261. WSR 20-02-062, § 390-37-182, filed 12/24/19, effective 1/24/20. Statutory Authority: RCW **29B.20.030**(1) and 2018 c 304. WSR 18-24-074, § 390-37-182, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW **29B.20.030**(1). WSR 16-01-015, § 390-37-182, filed 12/4/15, effective 1/4/16. Statutory Authority: RCW **29B.20.030, 29B.60.020,** WSR 13-05-014, § 390-37-182, filed 2/7/13, effective 3/10/13.]