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

Memorandum

To: Public Disclosure Commission

From: Carolyn Jones, Compliance Coordinator

Date: September 10, 2026

Subject: Keri Bro Enforcement Hearing Memorandum: PDC Case 195371

Allegations:

PDC staff alleges that Keri Bro (the Respondent), a current City Council Member for City of Airway Heights violated RCW 29B.55.010 by failing to file a Personal Financial Affairs Statement (F-1 report) for calendar year 2025, due not later than April 15, 2026.

Background:

- Keri Bro is a City Council member for City of Airway Heights. She was elected to the office in 2026.

- Between February 20 and April 20, 2026, PDC staff sent email reminders to all officials regarding their missing Financial Affairs Statement (F-1 Report) for calendar year 2025.

- On September 4, 2026, PDC staff emailed a hearing notice regarding the missing report for calendar year 2025. Additionally, staff mailed a copy of the hearing notice. This hearing notice was sent to the Respondent's email address and mail address of record. **(Exhibit 1)**

- As of September 9, 2026, the Respondent has not filed an F-1 covering calendar year 2025.

Prior Violation:

PDC Case 173061: **(Exhibit 2)**

- The Respondent failed to file a Candidate Registration (C-1 report) and a Personal Financial Affairs Statement (F-1 report), which were due no later than May 23, 2025.
- At a June 24, 2025, Adjudicative Proceeding (Brief Enforcement Hearing), the Respondent was found in violation of RCW 42.17A.205 (Recodified as RCW 29B.25.020) for failure to file a Candidate Registration (C-1 report) and RCW 42.17A.700, (Recodified as RCW 29B.55.010) for failure to file a Personal Financial Affairs Statement, (F-1 report), and assessed a $500 penalty.
- To date, the Respondent has not paid the outstanding $500 civil penalty for case 173061.
- In addition, the missing C-1 and F-1 reports have not been filed.

Additional Information

- Per WAC 390-37-143(5), cases "will automatically be scheduled before the full commission for an enforcement action when the respondent:
  "(a) Was found in violation during a previous reporting period;
  "(b)The violation remains in effect following any appeals; and
  "(c) The person has not filed the disclosure forms that were the subject of the prior violation at the time the current hearing notice is being sent."

Staff Recommendation:

Staff recommends the Commission find that the Respondent violated RCW 29B.55.010 by failing to timely file an F-1 report for calendar year 2025, and:

1. Assess the Respondent a civil penalty for a first instance at full hearing of a violation where the report was not filed before the date of the hearing per WAC 390-37-182, to be made payable within 30 days of the date of the Order. The base penalty range for this fact pattern is $0-$3000: and

2. Require the Respondent to file the missing F-1 report for calendar year 2025 and the missing reports as noted in PDC Case 173061 within 30 days of the date of the Order.

Attachments:

Exhibit 1: 195371 Keri Bro F-1 Full Hearing Notice

Exhibit 2: 173061 Keri Bro F-1 Candidate BAP Order (GE25)

PDC Exhibit 1

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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.]

PDC Exhibit 2

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July 22, 2025

Delivered electronically to VoteBro2025@gmail.com.

Subject: PDC Order, Case 173061

Dear Keri Bro,

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

At the June 24, 2025, Brief Enforcement hearing, the Presiding Officer assessed a total civil penalty of $500, of which $200 is suspended, in accordance with WAC 390-37-143. The $300 non-suspended penalty is payable within 30 days of the date of this Order, August 21, 2025.

Online Payment Option:
To make an online payment please 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

It is also ordered that you file the missing C-1 and F-1 Reports within 30 days of this order, August 21, 2025.

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 Jordan Campbell
PDC Staff
Enclosure: Initial Order

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A Keri Bro, Respondent.	PDC Case 173061 Findings of Fact, Conclusions of Law, and **Order Imposing Fine.**

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to Keri Bro dated May 28, 2025, a brief adjudicative proceeding was held on June 24, 2025, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.205 by failing to file or timely file a Candidate Registration (C-1 report) and RCW 42.17A.700 by failing to file or timely file a Personal Financial Affairs Statement (F-1 report), disclosing personal financial information for the preceding twelve months, which were both due to be filed within two weeks of candidacy or no later than May 23, 2025.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Chair J. Leach was the Presiding Officer. Commission staff was represented by Compliance Coordinators Colin Peeples, Jordan Campbell and Shelley Warnock. The Respondent did not participate in the hearing or submit any written material.

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

FINDINGS OF FACT

1. The Respondent is or was a candidate for CITY COUNCIL MEMBER of CITY OF AIRWAY HEIGHTS.

2. As a candidate, the Respondent was required to file C-1 and F-1 reports by May 23, 2025.

3. The Respondent did not file the C-1 report by the date of the enforcement hearing.

4. The Respondent did not file the F-1 report by the date of the enforcement hearing.

5. 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:

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

7. The Respondent violated RCW 42.17A.205 by failing to file the C-1 report by May 23, 2025.

8. The Respondent violated RCW 42.17A.700 by failing to file the F-1 report by May 23, 2025.

ORDER

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

1. **IT IS HEREBY ORDERED that the Respondent shall file the missing C-1 & F-1 reports within 30 days of the date of this Order and is assessed a total civil penalty of $500, in accordance with the candidate C-1 & F-1 penalty schedule set forth in WAC 390-37-143.**

2. **It is further ordered that that $200 of the $500 penalty is suspended on the following conditions:**

    a. **The Respondent does not commit any further violations of Chapter 42.17A 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 $300 non-suspended civil penalty within 30 days of the date of this Order.**

    c. **The Respondent files the missing C-1 report within 30 days of the date of this Order.**

    d. **The Respondent files the missing F-1 report 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 42.17A and 390 WAC.**

    b. **The missing C-1 report shall be due immediately.**

    c. **The missing F-1 report shall be due immediately.**

    d. **The order shall be void in the event that candidate files a termination statement by June 30, 2025.**

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

Entered this 22nd of July, 2025.

Public Disclosure Commission

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

I, Jordan Campbell, certify that I emailed a copy of this order to the Respondent at their address of record on the date stated herein.

Electronically Signed Jordan Campbell — July 22, 2025
Signed — Date

APPEALS 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 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 APPEAL RIGHTS – SUPERIOR COURT

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 APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.