



State of Washington
PUBLIC DISCLOSURE COMMISSION

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Memorandum

To: Public Disclosure Commission

From: Tabitha Townsend, Compliance Officer

Date: April 1, 2025

Subject: Request from Washington Dental Service PAC, Reporting Modification

Partial Modification – Background & Request:

- On July 29, 2024, the Public Disclosure Commission (PDC) received a request for redaction of 14 contributor's residential addresses. It was explained that all parties would need to submit requests for redaction.
- On February 27, 2025, the Public Disclosure Commission (PDC) received a request from Sean Pickard for redaction of information connected to contributions made to WA Dental Services PAC by multiple contributors, on a C-5 filed with the PDC on October 28, 2016, that were disclosed pursuant to the filing requirements described in [RCW 42.17A.250](#).
- Contributors replied to emails sent to them by Sean Pickard to request the redaction of information connected to their residence previously disclosed as part of a contribution.
 - Sean Pickard emailed on February 27, 2025
 - Garrett Whitney emailed on March 4, 2025
 - Cindy Snyder emailed on March 4, 2025
 - Brad Berg emailed on March 4, 2025
 - Diane Lowry Oakes emailed on March 18, 2025
- PDC Staff informed Sean Pickard of the modification process.
- Mr. Pickard was (2016) and is still (2025) the Treasurer for the WA Dental Svc PAC and gives his consent for these requests for redaction as a PAC officer.

- The aforementioned Requesters' records would be exempt from public disclosure if the Commission finds in accordance with [RCW 42.17A.120](#) and [WAC 390-28-080](#) that disclosure of such information would present a personal risk to a reasonable person.

List of Attachments

- Requests for Partial Reporting Modification (multiple); Received separately between February 27, 2025 and March 18, 2025
- Out of State Political Committee report (C-5 report); Submitted by WA Dental Svc PAC on October 18, 2016

Applicable Laws & Rules:

RCW 42.17A.120

Suspension or modification of reporting requirements.

(1) The commission may suspend or modify any of the reporting requirements of this chapter if it finds that literal application of this chapter works a manifestly unreasonable hardship in a particular case and the suspension or modification will not frustrate the purposes of this chapter. The commission may suspend or modify reporting requirements only to the extent necessary to substantially relieve the hardship and only after a hearing is held and the suspension or modification receives approval. A suspension or modification of the financial affairs reporting requirements in RCW [42.17A.710](#) may be approved for an elected official's term of office or for up to three years for an executive state officer. If a material change in the applicant's circumstances or relevant information occurs or has occurred, the applicant must request a modification at least one month prior to the next filing deadline rather than at the conclusion of the term.

(2) A manifestly unreasonable hardship exists if reporting the name of an entity required to be reported under RCW [42.17A.710](#)(1)(g)(ii) would be likely to adversely affect the competitive position of any entity in which the person filing the report, or any member of the person's immediate family, holds any office, directorship, general partnership interest, or an ownership interest of ten percent or more.

(3) Requests for reporting modifications may be heard in a brief adjudicative proceeding as set forth in RCW [34.05.482](#) through [34.05.494](#) and in accordance with the standards established in this section. The commission, the commission chair acting as presiding officer, or another commissioner appointed by the chair to serve as presiding officer, may preside over a brief adjudicatory proceeding. If a modification is requested by a filer because of a concern for personal safety, the information submitted regarding that safety concern shall not be made public prior to, or at, the hearing on the request. Any information provided or prepared for the modification hearing shall remain exempt from public disclosure under this chapter and chapter [42.56](#) RCW to the extent it is determined at the hearing that disclosure of such information would present a personal safety risk to a reasonable person.

(4) If the commission, or presiding officer, grants a modification request, the commission or presiding officer may apply the modification retroactively to previously filed reports. In that event, previously reported information of the kind that is no longer being reported is confidential and exempt from public disclosure under this chapter and chapter [42.56](#) RCW.

(5) Any citizen has standing to bring an action in Thurston county superior court to contest the propriety of any order entered under this section within one year from the date of the entry of the order.

(6) The commission shall adopt rules governing the proceedings.

RCW 42.17A.250

Out-of-state political committees—Reports. (Effective until January 1, 2026. Recodified as RCW 29B.25.110.)

(1) An out-of-state political committee organized for the purpose of supporting or opposing candidates or ballot propositions in another state that is not otherwise required to report under RCW 42.17A.205 through 42.17A.240 shall report as required in this section when it makes an expenditure supporting or opposing a Washington state candidate or political committee. The committee shall file with the commission a statement disclosing:

- (a) Its name and address;
- (b) The purposes of the out-of-state committee;
- (c) The names, addresses, and titles of its officers or, if it has no officers, the names, addresses, and the titles of its responsible leaders;
- (d) The name, office sought, and party affiliation of each candidate in the state of Washington whom the out-of-state committee is supporting or opposing and, if the committee is supporting or opposing the entire ticket of any party, the name of the party;

- (e) The ballot proposition supported or opposed in the state of Washington, if any, and whether the committee is in favor of or opposed to that proposition;
- (f) The name and address of each person residing in the state of Washington or corporation that has a place of business in the state of Washington who has made one or more contributions in the aggregate of more than *twenty-five dollars to the out-of-state committee during the current calendar year, together with the money value and date of the contributions;
- (g) The name, address, and employer of each person or corporation residing outside the state of Washington who has made one or more contributions in the aggregate of more than *two thousand five hundred fifty dollars to the out-of-state committee during the current calendar year, together with the money value and date of the contributions. Annually, the commission must modify the *two thousand five hundred fifty dollar limit in this subsection based on percentage change in the implicit price deflator for personal consumption expenditures for the United States as published for the most recent twelve-month period by the bureau of economic analysis of the federal department of commerce;
- (h) The name and address of each person in the state of Washington to whom an expenditure was made by the out-of-state committee with respect to a candidate or political committee in the aggregate amount of more than *fifty dollars, the amount, date, and purpose of the expenditure, and the total sum of the expenditures;
- (i) A statement that the out-of-state committee has received a certification from any partnership, association, corporation, organization, or other combination of persons making a contribution reportable under this section that:
 - (i) The contribution is not financed in any part by a foreign national; and
 - (ii) Foreign nationals are not involved in making decisions regarding the contribution in any way; and
 - (j) Any other information as the commission may prescribe by rule in keeping with the policies and purposes of this chapter.
- (2) Each statement shall be filed no later than the tenth day of the month following any month in which a contribution or other expenditure reportable under subsection (1) of this section is made. An out-of-state committee incurring an obligation to file additional statements in a calendar year may satisfy the obligation by timely filing reports that supplement previously filed information.