



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Memo

To: PDC Commissioners
From: Sean Flynn, General Counsel
Date: August 21, 2025
Re: Draft proposed legislation to update C-4 reporting schedule

The PDC staff has prepared draft legislation (attached) to develop the Commission's interest in updating the campaign reporting schedule, particularly focusing on committee expenditure (C-4) reports throughout the year. The purpose of the proposal is to implement a new reporting schedule that will standardize the required reporting dates to improve filing compliance and transparency for the public.

The main elements of this draft include:

- Eliminating the 21- and 7-day pre-election C-4 reports for campaigns that are participating in an upcoming election.
- Replacing the existing pre-election reporting dates with a requirement that *all* registered candidates and committees (including incidental and continuing committees) to file an additional C-4 report on the 25th day of each month during July through October (to cover the period before the primary and general election), regardless of participation status in any upcoming election.
- Extending the reporting requirement to *all* registered candidates and committees for filing a C-4 report on the 10th day of each month, and eliminating the thresholds for contribution and expenditure activity.
- Extending the reporting period for last-minute-contributions (LMCs) before the primary and general election to begin on the day the last report is filed before the election (which would be the 25th day of the previous month according to the new schedule). NOTE: The LMC period for the general election currently begins 21 days before the election. The reporting period for the primary currently is 7 days before the election. The reporting period for special elections is not changed and remains 21 days before the special election, since the February and April elections can fall during the same week as the last (10th day) report filed, which would shrink the reporting period for the LMC.

Several issues remain open for consideration that are not included in this proposal:

- Whether to change the independent expenditure C-6 reporting schedule to match the new C-4 reporting schedule. Currently, after the initial C-6 is reported the person must file subsequent 21- and 7-day reports before an election if they make an additional independent expenditure, which corresponds to the current C-4 schedule. If the C-4 schedule is changed, it would disaggregate from the new C-6 current schedule.
- Whether to exclude incidental committees from the new C-4 reporting schedule. Incidental committees only report during the calendar year in which they qualify to register. Currently, once an incidental committee is registered it must file a 21- and 7-day pre-election report for an election in which it is participating. Incidental committees also must file a C-8 report in other months if their top payments change or they make a qualifying contribution to a candidate or PAC.
- Whether to adjust the February and April special election dates within the new C-4 reporting schedule. The special election dates can fall outside the first week of the month, which creates potential conflicts with a report due on the 10th day of the month.
- Whether to include processes for more orderly and systematic enforcement of filing requirements.