



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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## **Memo**

To: PDC Commissioners  
From: Sean Flynn, General Counsel  
Date: September 18, 2025  
Re: C-4 Reporting Schedule –Proposal Modifications

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Staff is offering modifications to the framework of the legislative proposal presented in August regarding changes to the C-4 reporting schedule. That original proposal would place all candidates and committees on the same reporting schedule, including monthly reports and additional reporting during the election season (July-November).

This modification would separate “participating” and “non-participating” campaigns and create two reporting tracks. All campaigns would still file monthly reports, but only “participating” campaigns would have to file additional reports during the election season. The categories would reset at the beginning of each calendar year.

Non-participating campaigns would include all candidates not in an election year and all PACs designating non-participation in a given year. Creating a separate non-participating track would reduce the number of campaigns needing to file additional reports during the election season without compromising transparency goals, since those campaigns are not active in the election. The categories also provide a method that can be tracked within the PDC reporting system to distinguish which campaigns are required to file additional reports.

### **Two-Track Reporting Schedule**

- Track 1 – Non-Participating Campaigns
  - Schedule: File a report on the 10<sup>th</sup> of each month throughout the year.
  - Campaigns Included:
    - All candidates that do not have an election that year.
    - Any PAC that designates it is not participating in any election that year.
- Track 2 – Participating Campaigns
  - Schedule: File monthly reports on the 10<sup>th</sup> day every month and additional reports on the 25<sup>th</sup> day each month during the election season (July – October).

- Campaigns:
  - All candidates that have an election in that year.
  - Any PAC that indicates its plans to participate in an election that year.

### **Mechanism**

- All PACs must update their registration (or otherwise designate) at the beginning of each year whether they are expecting to participate in any election.
  - PACs claiming no participation will be placed in Track 1 reporting.
  - PACs expecting to participate will be placed in Track 2 reporting.
- A PAC may change status during the year, participating or non-participating, in order to switch reporting tracks.
- Candidates and PACs may file “no activity” for monthly reports where the campaign did not receive or spend any funds.