



**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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

October 29, 2021

Delivered electronically to Christian Leonard at [leonard@christianresolutions.com](mailto:leonard@christianresolutions.com)

Subject: Complaint filed by Conner Edwards, PDC Case 98589

Dear Mr. Leonard:

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed with the Public Disclosure Commission (PDC) on September 14, 2021.

As noted below in the letter to Mr. Edwards, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into this allegation or take further enforcement action in this matter.

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
Kim Bradford, Deputy Director for  
Peter Lavalley, Executive Director



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972





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October 29, 2021

Delivered electronically to Conner Edwards at [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: Complaint regarding Christian Leonard, PDC Case 98589

Dear Mr. Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 14, 2021. Your complaint alleged that Christian Leonard, a 2018 candidate for Spokane County Assessor, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately report expenditure descriptions for political advertisements undertaken by his 2018 Campaign for Spokane County Assessor.

PDC staff reviewed your allegation; the applicable statutes, rule(s), and the reporting requirements; the Summary Full Report Receipt and Expenditure (C4) reports filed by Christian Leonard For Assessor (Campaign); and the September 22, 2021, response to the complaint provided by Christian Leonard, on behalf of the Campaign.

Based on staff's review, we found the following:

- On March 3, 2018, Christian Leonard timely filed a Candidate Registration (C-1) report and selected the Full Reporting Option.
- The complaint alleged that the Campaign failed to timely and accurately disclose expenditure descriptions for political advertisements. Specifically, the complaint alleged that the Campaign failed to provide the required expenditure description for two Robocalls totaling \$1,001.34 and a \$187 newspaper that were disclosed on the amended 2018 7-Day Pre-General Election C-4 report.
- Staff reviewed the C-4 reports filed by the Campaign and found that the Campaign failed to provide the required descriptions for the two items noted supra (two Robocalls and a Newspaper Ad), that were disclosed on the amended 2018 7-Day Pre-General Election C-4 report.
- On September 29, 2021, the Campaign amended eight C-4 reports and provided the required descriptions for all Robocalls and Newspaper Ads, as required by the statutory scheme.

Based on our findings, staff has determined that, in this instance, failure to provide the required descriptions does not amount to a violation that warrants further investigation. The Campaign was responsive and amended

the pertinent reports as soon as the deficiency in the expenditure description requirement was brought to their attention.

Christian Leonard made a minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of these errors, Christian Leonard timely amended his reports, making the necessary technical corrections as requested by staff.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov)

Sincerely,

Endorsed by,

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
Kim Bradford, Deputy Director for  
Peter Lavallee, Executive Director

cc: Christian Leonard

