



**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

October 24, 2022

Delivered electronically to Peter Browning at “pbrowning.solutions@gmail.com”

Subject: Complaint filed by Conner Edwards, PDC Case 111268

Dear Peter Browning:

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

As noted 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 these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Edwards. Staff expects you to timely and accurately file all required reports of contributions and expenditures in future years. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed

Jennifer Hansen
Compliance Officer

Electronically signed

Peter Frey Lavalley
Executive Director



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October 24, 2022

Delivered electronically to Conner Edwards at “cg.edwards53@gmail.com”

Subject: Complaint regarding Peter Browning, PDC Case 111268

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 2, 2022. The complaint alleged that Peter Browning, a candidate for County Commissioner for Skagit County in the 2020 election, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- On February 27, 2020, Peter Browning submitted a Candidate Registration Statement (C-1 report) declaring his candidacy for County Commissioner for Skagit County in the 2020 election, selecting the “Full Reporting” option and listing Blake Browning as Campaign Manager and Treasurer.
- Mr. Browning was elected to the Skagit County Commission in the 2020 general election.
- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions, in-kind donations of goods or services, and expenditures made by the campaign.
- RCW 42.17A.240 describes the required content of each campaign reports including the name and address of each person making contributions and to whom an expenditure was made.
- The Campaign timely filed two C-4 reports: (1) the 21-Day Pre-Primary C-4 report disclosing \$6,311.73 in total monetary contributions and \$5,577.33 in total expenditures; and (2) the Post-Primary C-4 report disclosing \$450 in new monetary contributions and \$3,444.80 in total expenditures.
- The Campaign timely filed twelve C-3 reports disclosing monetary contributions including cash deposits not timely disclosed on the 21-Day Pre-Primary and Post-Primary C-4 reports.
- The 2020 Browning Campaign submitted four original C-3 reports late and three late C-4 reports. One C-4 report was not submitted until after the 2020 general election and

disclosed three expenditures made in October 2020 specifically two expenses totaling \$12,074.74 to Lithtex for mailings and \$200 to Skagit Media Marketing for work on a digital application.

- A review of the 2020 Browning Campaign’s reporting revealed that the majority of the C-3 reports were timely filed and that all but one late filed C-4 reports were filed before the date of the general election.
- In his response, Mr. Browning apologized for the late reporting and stated the two different campaigns, one for Skagit County Commission in 2020 and a second for Skagit Hospital District Commissioner in 2021, led to confusion for him. He stated that he is now clear about his responsibilities and will not make this mistake again.

It appears that the late reporting was due in large part to a general lack of understanding of PDC reporting obligations by the Respondent. Although this confusion was the major contributing factor in the late reporting, staff found no evidence that the late reporting was done intentionally to conceal campaign activity from the public.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file C-3 and C-4 reports for the 2020 Browning Campaign does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Peter Browning will receive a formal written warning concerning failure to timely and accurately disclose contributions and expenditures for his 2020 Campaign. The formal written warning will include staff’s expectation that Mr. Browning timely and accurately files all future required reports of contributions and expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director

cc: Peter Browning