



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

April 8, 2024

Delivered electronically to Michael Machado, Treasurer of Help Eastmont Levy Pass 2 committee, at mwmachado1@aol.com

Subject: Complaint filed by Conner Edwards, PDC Case 147902

Dear Michael Machado:

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 these matters following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in these matters.

However, per WAC 390-37-060(1)(d), this serves as a formal written warning concerning the requirement under RCW 42.17A.235 and .240 to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), showing contributions and expenditures undertaken by a political committee. Staff expects the committee, moving forward, to file accurate and timely reports of contributions and expenditures in the ORCA system. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

If you have questions, you may contact Tanya Mercier by e-mail at pdc@pdc.wa.gov .

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavallee
Executive Director



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April 8, 2024

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

Subject: Complaint against Help Eastmont Levy Pass 2, PDC Case 147902

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on January 24, 2024. The complaint alleged that the Help Eastmont Levy Pass 2, a February 2024 Special Election levy committee, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), showing contributions and expenditures undertaken by the campaign.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; the Respondent's data in the PDC contribution and expenditure database; and other relevant information, to determine whether the record supports a finding of one or more violations.

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

- Help Eastmont Levy Pass 2 was a continuing committee in the 2022 February Special Election. A Political Committee Registration (C-1pc) was filed on October 29, 2023, amended November 4, 2023, for the Full Reporting option. Michael Machado is the Treasurer for the committee.
- Per RCW 42.17A.235 and .240, under the Full Reporting option, a committee is required to disclose contribution and expenditure information by submitting Receipts and Expenditure Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3) reports to the PDC. The Committee's due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.
 - RCW 42.17A.235(3)(a) indicates a C-4 report is due each month "if the committee has received a contribution or made an expenditure in the preceding calendar month and either the total contributions received, or the total expenditures made since the last such report exceed \$750."

- The committee filed a C-4 report on January 31, 2024, for the period 12/1/22 – 11/30/23. The committee should have filed a C-4 report by October 10, 2023, for the preceding months because the contributions received exceeded the \$750 threshold.
- The 21-day pre-election C-4 was due on January 23, 2024. The committee filed a C-4 for the period 12/1/23 – 1/22/24, on January 31, 2024. The report was eight days late.
- The 7-day pre-election C-4, due on February 6, 2024, was filed timely.
- The post-election C-4, due on March 11, 2024, was filed timely.
- The Respondent does not have other similar warnings of PDC requirements.

Based on our case review staff has determined that, in this instance, failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), showing contributions and expenditures undertaken by the February 2024 Special Election committee, does not amount to a finding of a violation that calls for further investigation.

Pursuant to WAC 390-37-060(1)(d), however, the Help Eastmont Levy Pass 2 committee will receive a formal written warning concerning the requirements under RCW 42.17A.235 and .240 to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), showing contributions and expenditures undertaken by a political committee. Staff expects the committee, moving forward, to file accurate and timely reports of contributions and expenditures in the ORCA system. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier by e-mail at pdcc@pdcc.wa.gov .

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

/s/ Electronically signed

Peter Frey Lavalley
Executive Director

cc: Michael Machado