

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

April 19, 2024

Delivered electronically to Jeannie Sahatdjian, Treasurer of Help Educate Lakewood Pupils, at lakewoodhelpcommittee@gmail.com

Subject: Complaint filed by Conner Edwards, PDC Case 148402

Dear Jeannie Sahatdjian:

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 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 February 2024 Special Election 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,

Endorsed by,

/s/ Electronically signed

Tanya Mercier Compliance Officer /s/ Electronically signed

Peter Frey Lavallee Executive Director



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April 19, 2024

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

Subject: Complaint against Help Educate Lakewood Pupils, PDC Case 148402

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on February 8, 2024. The complaint alleged that Help Educate Lakewood Pupils, 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 decide whether the record supports a finding of one or more violations.

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

- Help Educate Lakewood Pupils filed a Committee Registration (C-1pc) on December 07, 2023, for the Full Reporting option. Jeannie Sahatdjian 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.
- The 21-day pre-election C-4 was due on January 23, 2024. The committee filed a C-4 for the period 12/01/23 01/22/24, on January 23, 2024. The report was filed timely.
- The 7-day pre-election C-4 was due on February 06, 2024. The committee filed a C-4 for the period 01/23/24 02/05/24, on February 08, 2024. The report was two days late.

- 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, Help Educate Lakewood Pupils will receive a formal written warning concerning 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 February 2024 Special Election 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 pdc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier Compliance Officer Endorsed by,

/s/ Electronically signed Peter Frey Lavallee

Peter Frey Lavallee Executive Director

cc: Jeannie Sahatdjian