#### **Respondent Name**

Citizens For Ridgefield Schools

### **Complainant Name**

# Conner Edwards

# **Complaint Description**

### **Conner Edwards**

#### reported via the portal

12 hours ago (Wed, 3 Apr 2024 at 5:25 AM)

This respondent filed the required 21 day report nearly 2 weeks prior to the deadline, which suggests that it does not include some or all of the activity that occured during the relevant timeframe.

This is not just conjecture. After the 21-day C4 report was filed, an additional C3 was filed to show a deposit made on 3/25/24 for \$100.34, see link: <u>https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110206264.</u>

This deposit was not reflected on Schedule A (part 1) of the C4 for the 21-day pre-election period and at a minimum the C4 should be amended to reflect this: https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110205937.

The C4 also fails to include the underlying vendor and address of the vendor for several in-kind contributions. While I don't believe this is required, I know that agency staff believe otherwise.

Additionally, the number of printed items for expenditures wasn't disclosed and additionally the name and address for underlying vendors for reimbursement expenditures wasn't disclosed.

Because the respondent failed to timely file an accurate pre-election 21 day C4, members of the public are unable to tell whether the comittee received certain types of contributions or made expenditures during the relevant timeframe, significantly reducing transparency available to the public.

PDC staff must take prompt action on this complaint to help render the assistance neccessary to bring this filer into compliance.

The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of candidates and enforce filing requirements damages both the public and the candidates themselves.

I have tried many different times to get the PDC to take action on this type of issue with no tangible results whatsoever. Having exhausted all of my other options to pursue reform, the only remaining option available to me to compel the agency to take action here is to file PDC complaints against these noncompliant filers in an effort to force the agency to take action.

By highlighting the agency's failure to meaningfully enforce current reporting deadlines, my hope is that the agency will look to improve its own enforcement procedures and help candidates and treasurers comply with the law.

## **Notice to Respondents**

I apologize to you for any inconvenience caused by this complaint; it is not my intention. No campaign treasurer or campaign/committee is perfect. Trying to comply with the myriad of requirements and deadlines the PDC enforces can be extremely difficult, even for those who have been doing this for years.

The agency could adopt any number of strategies to help filers "get it right" when it comes to deadlines and other requirements.

Some of these strategies might include: a) automated electronic filing reminders to a filer when they have missed a deadline, b) mandatory attendance in a PDC training course before a person is allowed to serve as treasurer, c) giving filers 48 hours to file 21- & 7-day pre-election reports as opposed to the 24 hours candidates currently get, and d) improvements to the ORCA online campaign finance filing system to improve useability.

In my opinion, the agency has failed to provide many filers with the knowledge and tools that they need to file reports on time and be compliant.

If you are confused by the filing requirements that the agency enforces or are experiencing technical difficulties and/or usability issues with the ORCA system, please be sure to indicate this in your response to the PDC: your comments will provide extremely valuable feedback for the agency.

## What impact does the alleged violation(s) have on the public?

Because the respondent failed to timely file an accurate 21-day pre-election C4, members of the public are unable to tell whether the comittee received certain types of contributions or made expenditures during the relevant timeframe, significantly reducing transparency available to the public.

PDC staff must take prompt action on this complaint to help render the assistance neccessary to bring this filer into compliance.

#### List of attached evidence or contact information where evidence may be found

See PDC website.

## List of potential witnesses

See PDC website, also committee.

## **Certification (Complainant)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.