



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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April 7, 2025

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Subject: PDC Case 151232 regarding Cynthia Slizza Donahue

Dear Cynthia Slizza Donahue:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on February 20, 2024 and August 2, 2024. The complaints alleged violations of RCW 42.17A.235 and .240 for failing to timely and accurately disclose contributions and expenditures on PDC reports for election year 2023, specifically the post-Primary C-4 report, a C-3 report, and an expenditure description for printed items.

Applicable Laws and Rules

- Candidates are required to register pursuant to [RCW 42.17A.205](#) by filing a *Candidate Registration* (C-1 report) with the PDC within two weeks of candidacy.
- A candidate that selects the Full Reporting option on their C-1 report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the candidate's election participation¹, and their financial activity.
- Pursuant to [RCW 42.17A.240\(7\)](#), expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person² to whom an expenditure was

¹ [RCW 42.17A.005\(38\)](#) defines "participate" to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).

² "Person" includes "an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized." [RCW 42.17A.005\(39\)](#).

made in the aggregate of more than \$200³ during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures. Purpose details should state the goods or services provided by the vendor, including the number of items purchased, identify any candidates or ballot propositions supported or opposed by the expenditure, and the name & address of any sub-vendors used. For advertising expenditures, campaigns should describe the type and number of ads, where they appeared or were broadcast, and when (e.g. run dates). An in-kind contribution is disclosed like an expenditure on the PDC's Online Reporting of Campaign Activity (ORCA) software.

Background and Findings

- Cynthia Slizza Donahue (the “Respondent”) was a candidate for election year 2023 who ran for City Council Member of the City of Spokane and lost in the 2023 Primary Election. She submitted a *Declaration of Candidacy* to Elections for this position on May 15, 2023.
- The Respondent registered as a candidate with the PDC on March 13, 2023, and selected the Full Reporting option on her C-1 report (*Candidate Registration*).
- An Initial Hearing (Case Status Review) was held for this case on May 13, 2024.
- The Respondent’s treasurer emailed the PDC on July 8, 2024, indicated his belief that an accounting error had occurred, and said the campaign expected to be able to correct their reports by the end of the month.
- On September 5, 2024, the Respondent provided a written response to the complaint by email acknowledging they failed to properly document a portion of their financial activity, an omission that was not detected until the end of the campaign. She said the campaign had intended to remedy their reporting before the post-Primary C-4 report filing deadline of 9/11/23 but their efforts were delayed by a medical emergency and lengthy illness in the families of the candidate and treasurer, which necessitated multiple hospital stays and intense caregiving. The Respondent said there was no malicious intent in the campaign’s noncompliance.
- The Respondent does not have previous warnings/violations of PDC requirements.

Late Reports (2023)

- The campaign’s monthly C-4 report for April was filed 1 day late.
- The committee timely filed a 21-day pre-Primary C-4 report but it did not cover the full reporting period of 6/1-7/11. As a result, expenditures made on 7/11 – which were due to be reported on 7/12 – were not disclosed until the campaign filed its 7-day pre-Primary C-4 report (covering 7/11-7/24) on 7/25/23. As a result, \$4,211.15 in election-related expenditures were disclosed 13 days late but before the August 1, 2023 Primary Election.

³ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- The post-Primary C-4 report (covering 7/25-8/31) was filed 283 days late, after the Primary Election, and disclosed a total of \$3,844.12 in expenditures, about \$1,050 of which appeared to be election related.
- One C-3 report disclosing \$450 in contributions received was filed 424 days late. Another C-3 report, filed 449 days late, disclosed the candidate's \$1,000 loan to her own campaign, which is partially mitigating. Three other C-3 reports were filed one day late.
- The campaign also filed zero-dollar monthly C-4 reports for September, October and November in June and August of 2024, which are mitigated by a lack of financial activity.

The campaign's monthly C-4 reports for March and May were timely filed, as were its 7-day pre-Primary and 21-day pre-Primary C-4 reports. Fifty-seven C-3 reports were filed timely and many were submitted early.

In-Kind Contribution and Expenditure Details (2023)

- The 7-day pre-Primary C-4 report (covering 7/11-7/24) was amended to include the number and type of items printed and produced by Walt's Mailing Service on 7/11/23 and 7/18/23, and the number of signs purchased from Minuteman Press on 7/14/23.
- Per the PDC's request, the campaign amended other C-4 reports to include additional details for in-kind contributions and expenditures, such as vendor name and address, item descriptions, the number of items purchased, and the type of advertising or printed materials.

Summary and Resolution

The following mitigating factors apply in your case: 1) you are a first-time filer; 2) noncompliance appears to be the result of good-faith omissions; and 3) delays in resolving these omissions were due to personal family emergencies and illnesses.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely disclose all contribution and expenditures. PDC staff expect you to timely file all required reports of contributions and expenditures in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff are also reminding you about the importance of providing sufficient descriptions for in-kind contributions and expenditures on C-4 reports. PDC staff expect that, in the future, you will include such details on C-4 reports in accordance with PDC laws, rules, and guidance.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

Any allegations regarding reporting by you for election year 2023 that are not otherwise addressed herein are hereby dismissed.

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Conner Edwards