



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 12, 2025

Delivered electronically to darylbullard@gmail.com

Subject: PDC Case 151235 regarding Daryl Bullard

Dear Daryl Bullard:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on February 20, 2024. The complaint 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 21-day pre-Primary, 7-day pre-Primary, and post-Primary C-4 reports.

Applicable Laws & 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 participation, and their financial activity.

Background & Findings

- Daryl Bullard (the "Respondent") was a candidate for election year 2023 who ran for School Director of West Valley School District 208 and lost in the 2023 Primary Election. There was no candidate filing fee associated with the *Declaration of Candidacy* the Respondent submitted to Elections for this position on May 15, 2023.
- The Respondent registered as a candidate with the PDC on June 12, 2023, and selected the Full Reporting option on his C-1 report (*Candidate Registration*). He served as his own Treasurer.
- An Initial Hearing (Case Status Review) was held for this case on May 13, 2024.

- The Respondent first responded to the complaint by email on June 24, 2024, and indicated he didn't accept or spend any money and was unable to file a C-4 report in the PDC's Online Reporting of Campaign Activity (ORCA) system. PDC staff subsequently reached out to the Respondent by email with an offer of assistance.
- On July 24, 2024, the Respondent filed four C-4 reports covering the period of 6/12/23 through 9/30/23, including the missing pre- and post-election reports. The C-4 reports disclosed zero contributions received and expenditures made.
- The Respondent followed up by email on July 24, 2024, and said he did not timely submit C-4 reports because it was unclear to him how to do so.
- The Respondent does not have previous warnings/violations of PDC requirements.

Summary and Resolution

Noncompliance appears to be the result of a good-faith omission and misunderstanding regarding how information is entered into the ORCA system. Although you are not a first-time filer, your previous candidacy was in 2013 and your response indicates you lack experience using newer versions of ORCA.

The campaign's lack of reportable contribution and expenditure activity in 2023 is a mitigating factor in this case. It is further noted that the minimal nature of your campaign's financial activity would have qualified you to choose the Mini Reporting option¹ on the *Committee Registration* (C-1pc report), relieving you of the requirement to file C-3 and C-4 reports with the PDC in 2023.

Your violations of PDC laws and rules are remediable in nature and do not warrant further investigation or enforcement action. The expenditures and contributions involved totaled no more than the contribution limits set forth in RCW 42.17A.405(2) or \$1,000, were inadvertent and minor and otherwise have been cured, and did not materially harm the public interest beyond the harm to the policy of Chapter 42.17A RCW inherent in any violation.

You were a candidate who lost the election and did not receive aggregate contributions over the amount set forth in RCW 42.17A.005(46)(d)(ii)(B) per election during the campaign. The aggregate contributions received were zero dollars.

Although it was not alleged in the complaint, PDC staff is reminding you about the importance of timely registering as a candidate with the PDC within two weeks of becoming a candidate in the future in accordance with PDC laws and rules.

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

¹ A candidate that raises and spends no more than \$7,000 (in addition to candidate filing fee) and receives no more than \$500 from any single contributor (other than the candidate themselves) can select the Mini Reporting option on their registration (C-1 report), which relieves them of the requirement to file C-3 and C-4 reports with the PDC disclosing their campaign's contributions and expenditures. The \$7,000 limit was increased from \$5,000 effective April 1, 2023.

Sincerely,

Electronically signed by Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Conner Edwards at cg.edwards53@gmail.com