



**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: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

March 12, 2025

Delivered electronically to [maebanyone@gmail.com](mailto:maebanyone@gmail.com) and [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: PDC Case 151239 regarding Sherri Darrow

Dear Sherri Darrow:

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

- Sherri Darrow (the "Respondent") was a candidate for election year 2023 who ran for School Director for Toppenish School District 202 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 17, 2023.
- The Respondent registered as a candidate with the PDC on June 8, 2023, and selected the Full Reporting option on her C-1 report (*Candidate Registration*). She served as her 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 July 14, 2024, said she had been in the mountains, had not received any “mail [sic]”, and thought she had filed all the required documents. PDC staff subsequently reached out to the Respondent by email and provided additional information and instructions.
- On July 17, 2024, the Respondent emailed the PDC and said she had planned to select the Mini Reporting option and didn’t realize she had to indicate this preference on the C-1 report. She didn’t know that C-3 and C-4 reports would be required and thought she was finished after submitting the C-1 report.
- On July 18, 2024, the Respondent reached out by email and said she had been trying to file for 2023 but could only bring up 2024 reports in ORCA. However, before PDC staff could assist her, the Respondent subsequently filed a C-4 report on July 19, 2024, covering the period of 6/8/23 through 12/31/23, which included pre- and post-election reporting periods. The C-4 report disclosed zero contributions received and expenditures made.
- 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 to select the Mini Reporting option in ORCA. Although you are not a first-time filer, you selected the Mini Reporting option for your previous candidacy in 2019 and therefore lack experience with C-3 and C-4 reporting requirements.

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 the campaign’s financial activity would have qualified you to choose the Mini Reporting option<sup>1</sup> 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.

---

<sup>1</sup> 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.

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](mailto:pdcc@pdc.wa.gov).

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