



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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April 22, 2025

Delivered electronically to [grifoth134@hotmail.com](mailto:grifoth134@hotmail.com) and [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: PDC Case 151247 regarding Hunter Downe Henderson

Dear Hunter Henderson:

The Public Disclosure Commission (PDC) completed its review of a 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

- You were a candidate for election year 2023 who ran for City Council Member of the City of Tacoma and lost in the 2023 Primary Election. There was a \$495.87 candidate filing fee associated with the *Declaration of Candidacy* you submitted to Elections for this position on May 19, 2023.
- You timely registered as a candidate with the PDC on May 26, 2023, selected the Full Reporting option on your C-1 report (*Candidate Registration*), and served as your own Treasurer.
- You first responded to the complaint by email on April 4, 2024 and indicated you were unaware of the need to file reports and did not know how to do so. You requested assistance from PDC staff by email and telephone, and PDC staff subsequently reached out to you by email.

- On April 10, 2024 and April 11, 2024, you filed three C-4 reports covering the period of May 26, 2023 through August 31, 2023, which included pre- and post-election reporting periods.
- An Initial Hearing (Case Status Review) was held for this case on May 13, 2024.
- With the assistance of PDC staff, you filed three C-3 reports and amended multiple C-3 and C-4 reports between July 31, 2024 and September 13, 2024. You indicated that you encountered challenges filing PDC reports using your cell phone.
  - Your campaign disclosed a total of \$1,060.87 in monetary and in-kind contributions received and \$495.87 in total expenditures made for election year 2023.
- You do not have previous warnings/violations of PDC requirements.

### Summary and Resolution

Noncompliance appears to be the result of a good-faith omission and lack of familiarity with PDC reporting requirements and the Online Reporting of Campaign Activity (ORCA) system.

You are a first-time filer, which is a mitigating factor. The relatively small size of the campaign and modest expenditures in 2023 are also mitigating factors 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 option<sup>1</sup> on your *Committee Registration* (C-1pc report), relieving you of the requirement to file C-3 and C-4 reports with the PDC in 2023.

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 future required reports of contributions and expenditures, especially during time sensitive periods preceding an election in which you are participating. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or 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,

Endorsed by,

Electronically signed by Tabatha Blacksmith  
Tabatha Blacksmith  
Compliance Officer

Electronically signed by Peter Frey Lavallee  
Peter Frey Lavallee  
Executive Director

cc: Conner Edwards

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<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.