



**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.pdcc.wa.gov](http://www.pdcc.wa.gov)**

July 12, 2024

Delivered electronically to Dxwlaip Leaders sponsored by Tulalip Tribes of Washington at [ryanmiller@tulaliptribes-nsn.gov](mailto:ryanmiller@tulaliptribes-nsn.gov) and [rhatch@tulaliptribes-nsn.gov](mailto:rhatch@tulaliptribes-nsn.gov)

Subject: Complaint filed by Conner Edwards, PDC Case 154195

Dear Ryan Miller, Treasurer:

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Edwards, the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, per WAC 390-37-060(1)(d), this serves as a formal written warning concerning the requirement under RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately report a contribution. Staff expects the committee, moving forward, to follow all laws, rules and PDC guidance about filing timely and accurate reports of contributions. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

If you have questions, you may contact Tanya Mercier by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier  
Compliance Officer

/s/ Electronically signed

Peter Frey Lavalley  
Executive Director



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July 12, 2024

Delivered electronically to Connor Edwards at [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: Complaint against Dxwllalip Leaders sponsored by Tulalip Tribes of Washington, PDC Case 154195

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on May 13, 2024. The complaint alleged that Dxwllalip Leaders sponsored by Tulalip Tribes of Washington, a political committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately report a contribution.

PDC staff reviewed the allegation(s); the applicable statutes and rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- Dxwllalip Leaders is a political action committee (PAC) created to help elect Tribal Members into every level of political office in Washington State. The PAC is sponsored by Tulalip Tribes of Washington, a Federally Recognized Tribe, who are descendants and successors in interest to the Snohomish, Snoqualmie, Skykomish, and other allied bands signatory to the 1855 Treaty of Point Elliot.
- The Respondent first filed a Political Committee Registration (C-1pc) on October 15, 2021, for continuing committee status and the Full Reporting option. The current committee Chairperson is Teri Gobin, and the Treasurer is Ryan Miller.

- The Respondent filed a Cash Receipts Monetary Contributions (C-3) report on May 6, 2024, itemizing a contribution, deposited on March 15, 2024, for \$100,000 from Tulalip Tribes of Washington. A Campaign Summary Receipts & Expenditures (C-4) report, for period January 1, 2024, to April 30, 2024, was filed on May 6, 2024, also showing the \$100,000 as a contribution.
- In their response from June 12, 2024, the Respondent said:  
     [T]he report filed on 5/6/2024 indicated that a \$100,000 deposit was made on 3/15 but this was simply a miscommunication internally, a contribution from the sponsoring entity of the dxwlaip leaders PAC was approved on that date but the deposit wasn't actually made until 6/5/2024.
- Per PDC Interpretation 12-01, "Pledges of \$150 or more are reportable in Part 2 of Schedule B. Until redeemed or cancelled, the pledge will appear on the C-4 report, Schedule B, section 2."
- Based on the guidance provided in PDC Interpretation 12-01, the Respondent reported the contribution of \$100,000 incorrectly and should have reported the sum in April 2024 as a pledge on the monthly C-4 report. Once redeemed in June 2024, the contribution should have been reported on a weekly C-3 report in June. Because the PAC was not supporting or opposing any candidates in this period, the contribution should have been reported on the monthly C-4 report due in July. The \$100,000 was reported approximately one month late.
  - Note the pledge cannot be reported retroactively because the Online Reporting Campaign Activity (ORCA) system cancels out a pledge once redeemed and reported as a contribution. The applicable reports in ORCA were amended on June 6, 2024, to reflect the deposit of the contribution on June 5, 2024.
- The Respondent does not have other similar warnings or violations of PDC requirements.

Based on our findings staff has determined that, in this instance, failing to timely and accurately report a contribution does not amount to a finding of a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, Dxwlaip Leaders sponsored by Tulalip Tribes of Washington will receive a formal written warning concerning the requirement under RCW 42.17A.235 and .240 for failing to timely and accurately report a contribution. Staff expects the committee, moving forward, to follow all laws, rules and PDC guidance about filing timely and accurate reports of contributions. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s/ Electronically signed  
Tanya Mercier  
Compliance Officer

Endorsed by,

/s/ Electronically signed  
Peter Frey Lavalley  
Executive Director

cc: Dxwlalip Leaders sponsored by Tulalip Tribes of Washington