



**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 • Website: www.pdca.wa.gov

August 19, 2024

Delivered electronically to iaff864secretary@gmail.com , iaff864treasurer@gmail.com and iaff864president@gmail.com

Subject: Complaint filed by Conner Edwards, PDC Case 155445

Dear Renton Firefighters for Yes on Prop 1 Sponsored by Renton Firefighters Union Local 864:

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 Conner Edwards, the PDC has dismissed this matter in accordance with [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, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Edwards. PDC staff expects you to timely file all required reports of contributions and expenditures in future years. 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 finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director



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August 19, 2024

Delivered electronically to cg.edwards53@gmail.com

Subject: Complaint regarding Renton Firefighters for Yes on Prop 1 Sponsored by Renton Firefighters Union Local 864, PDC Case 155445

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on May 24, 2024. The complaint alleged that Renton Firefighters for Yes on Prop 1 Sponsored by Renton Firefighters Union Local 864, a single election political committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately file *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) disclosing contributions and expenditures undertaken by the committee.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the responses provided by Renton Firefighters for Yes on Prop 1 (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.

Applicable Laws & Rules

- [RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and 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 committee’s election participation, and their financial activity.

Background & Findings

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

- The Respondent is a single election political committee that registered with the PDC on June 29, 2023 and selected the Full Reporting option. On their C-1pc report, the Respondent indicated their support for Proposition 1 for Renton Regional Fire Authority in the 2023 Primary Election.
- On August 1, 2023, Proposition 1 for Renton Regional Fire Authority was passed by voters in the Primary Election.

- The committee first responded to the complaint by telephone on July 1, 2024 and stated their belief that they had filed reports. They indicated they would file the missing reports and submit a written response to the complaint allegation that week.
- On July 4, 2024, the Respondent committee filed the following reports:
 - A C-3 report for a 7/6/23 deposit that was filed 360 days late. The late report was partially mitigated by minimal activity (a \$5 contribution).
 - A 21-day pre-Primary C-4 report (covering 6/29/23-7/10/23), which was filed 358 days late and after the Primary election. The late report is partially mitigated by minimal financial activity, which consisted of a \$5 contribution.
 - A C-3 report for a 7/12/23 deposit of a \$3,000 contribution that was filed 353 days late.
 - A 7-day pre-Primary C-4 report (covering 7/11/23-7/24/23), which was filed 345 days late and after the Primary election. The report disclosed receipt of a \$3,000 contribution and a \$2,036.70 expenditure for “200 yard signs and stakes.”
 - A post-Primary C-4 report was filed 297 days late and partially mitigated by a lack of contribution and expenditure activity.
 - A monthly C-4 report for September was filed 268 days after it was due. The report is not late because the committee did not report any contributions or expenditures and therefore did not exceed the \$750¹ threshold for filing a monthly report.
 - A monthly C-4 report for October was filed 237 days late. The sole activity disclosed on the report consisted of a \$968.30 partial refund of a contribution. The late report is partially mitigated by the nature of its content, which was to correct a previously reported contribution.
- In their July 4, 2024 written response, the Respondent thanked the PDC for reaching out and its assistance in identifying the reports needed to restore compliance. They explained that human error led to the late reporting: The committee said that the person who was responsible for the campaign’s reporting (the Union’s Treasurer) had been exposed to the PDC’s online filing system (ORCA) but was unfamiliar with the new system. The Treasurer had kept detailed records of expenses and contributions but did not file the required reports. The committee indicated it had since filed the required reports and would work to ensure the timely completion of reporting in the future.
- The Respondent does not have previous warnings/violations of PDC requirements.

Summary and Resolution

Noncompliance appears to be the result of a good-faith error. The late 7-day pre-Primary C-4 report (covering 7/11/23-7/24/23) was filed after the 2023 Primary election and therefore

¹ Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

deprived the public of information during a time-sensitive period in the election, which is an aggravating factor. However, the committee's other late reports are mitigated by the minimal nature of the Respondent's contribution and expenditure activity.

Based on our findings, staff has determined that, in this instance, the Respondent's failure to timely file C-3 and C-4 reports for election year 2023 does not amount to a violation that warrants further investigation.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, Renton Firefighters for Yes on Prop 1 will receive a formal written warning concerning their failure to timely and accurately report contributions and expenditures in election year 2023. The formal written warning will include PDC staff's expectation that Renton Firefighters for Yes on Prop 1 timely file all future required reports of contributions and expenditures. The Commission will consider the 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 finds that no further action is warranted and has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Renton Firefighters for Yes on Prop 1 Sponsored by Renton Firefighters Union Local 864