



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

August 26, 2024

Delivered electronically to the International Federation of Professional and Technical Engineers Legislative Education Action Program Political Action Committee (IFPTE LEAP PAC) at mbiggs@ifpte.org and pconstantino@ifpte.org

Subject: Complaint filed by Conner Edwards, PDC Case 155608

Dear Matthew Biggs and Patricia Constantino:

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.250 for failing to timely and accurately report as an out-of-state political committee. Staff expects the IFPTE LEAP PAC, moving forward, to follow all statutes and rules about reporting of expenditures supporting or opposing a Washington state candidate or political committee. If violations of PDC statutes 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 pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

/s/ Electronically signed

Peter Frey Lavallee
Executive Director



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August 26, 2024

Delivered electronically to Conner Edwards at cg.edwards53@gmail.com

Subject: Complaint against the International Federation of Professional and Technical Engineers Legislative Education Action Program Political Action Committee (IFPTE LEAP PAC), PDC Case 155608

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on May 29, 2024. The complaint alleged that IFPTE LEAP PAC, a political committee, may have violated RCW 42.17A.250 by failing to timely and accurately report as an out-of-state political committee.

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:

- The IFPTE LEAP PAC is registered with the Federal Elections Commission under ID C00164509. The PAC is a connected organization to the International Federation of Professional and Technical Engineers. Matthew Biggs is the Treasurer of record.
- During the case review, staff discovered the PAC had participated in elections supporting campaigns in the 2020, 2022, 2023 and 2024 elections. The PAC had also taken part in Washington state elections in 2016 and 2019, but those campaigns are beyond the PDC statute of limitations.
 - In 2020, the campaign of June Robinson reported receiving \$500 from the IFPTE LEAP PAC. The PAC did not report the expenditure, on an Out-of-State Political Committee (C-5) Report, until August 19, 2024.

- Similarly, the Bob Ferguson campaign reported in 2022, 2023 and 2024 having received a total of \$3,250 from the PAC. Those expenditures were not reported by the PAC until August 5, 2024.
- Because the PACs expenditures were reported as contributions by the recipient candidates, the public was not deprived of critical information prior to an election.
- 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 as an out-of-state political committee does not amount a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, IFPTE LEAP PAC will receive a formal written warning concerning the requirement under RCW 42.17A.250 for failing to timely and accurately report as an out-of-state political committee. Staff expects the IFPTE LEAP PAC, moving forward, to follow all statutes and rules about reporting of expenditures supporting or opposing a Washington state candidate or political committee. If violations of PDC statutes 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@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

/s/ Electronically signed

Peter Frey Lavalley
Executive Director

cc: Matthew Biggs and Patricia Constantino