



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

Shaun Scott and The Fighting 43rd

Respondents.

PDC Case No. 155771

Amended Report of Investigation

I. Background, Complaints, and Allegations

Background

- 1.1 In 2024, Shaun Scott was a candidate for State Representative of the 43rd Legislative District, Position 2. Mr. Scott created the political committee “The Fighting 43rd” (the Committee) with the purpose of supporting his campaign. Mr. Scott appeared on the ballot for both the primary and general elections, and he won the 2024 election.

Complaints Received

- 1.2 On June 23, 2024, the Public Disclosure Commission (PDC) received a complaint from Conner Edwards alleging Mr. Scott failed to include complete sponsor identification on a political advertisement (POLAD) as required by RCW 42.17A.320. Mr. Edwards also alleged that the Committee failed to report vendor addresses on its *Receipts & Expenditure Summary* (C-4) reports as required by RCW 42.17A.235 and .240; failed to disclose contributions on its C-4 reports; and, per WAC 390-16-205, inaccurately included processing fees in donation amounts as reflected on *Cash Receipts Monetary Contributions* (C-3) reports and C-4 reports, resulting in the appearance of receiving overlimit contributions and reflecting inaccurate Cash on Hand Balances, respectively. Mr. Edwards also alleged that the Committee failed to report the quantity of printed items on C-4 reports, as required by WAC 390-16-037. **[Exhibit 1 at 3–7; Exhibit 9]**

- 1.3 On July 18, 2024, the PDC received a second complaint from Mr. Edwards alleging Mr. Scott and/or the Committee made improper use of campaign funds for personal use in violation of RCW 42.17A.445; failed to disclose contributions timely on C-3 reports in violation of RCW 42.17A.235 and .240; failed to report debt associated with a POLAD that was distributed on July 17, 2024, in violation of RCW 42.17A.240(9); and used an assumed name on a POLAD distributed on July 17, 2024 in violation of RCW 42.17A.320. **[Exhibit 1 at 10–14; Exhibit 9]**
- 1.4 On August 8, 2024, the PDC received a complaint from Katie Martin alleging Mr. Scott and/or the Committee failed to report debt in accordance with RCW 42.17A.235 and .240(9), and failed to disclose expenditures associated with POLADs in accordance with RCW 42.17A.235 and .240. Ms. Martin also alleged the complete address for an expenditure paid on July 29, 2024 to Adam Tradii, a fundraising consultant, was missing from the Committee’s C-4 report, in violation of RCW 42.17A.240. **[Exhibit 1 at 15–20; Exhibit 9]**
- 1.5 On September 17, 2024, the PDC received a complaint from Carl Larson alleging Mr. Scott and/or the Committee failed to file a C-3 report for a \$1,200 contribution from SEIU Local 925, received on August 16, 2024, and a \$600 contribution from Washington State Association of Justice, received on August 15, 2024, in violation of RCW 42.17A.235 and .240. **[Exhibit 1 at 29; Exhibit 9]**
- 1.6 On October 1, 2024, the PDC received communications from Mr. Edwards alleging the Committee’s post-primary C-4 report was not filed, in violation of RCW 42.17A.235. These allegations were added to Mr. Edwards’ second complaint. **[Exhibit 1 at 46; Exhibit 9]**
- 1.7 On October 17, 2024, the PDC received a third complaint from Mr. Edwards alleging Mr. Scott and/or the Committee failed to file the 21-day pre-general C-4 report, in violation of RCW 42.17A.240, and C-3 reports for received contributions reported by the contributing entities, per RCW 42.17A.235 and .240. **[Exhibit 1 at 47–69]; [Exhibit 9]**
- 1.8 On October 30, 2024, the PDC received a fourth complaint from Mr. Edwards alleging Mr. Scott and/or the Committee missed filing of the 7-day pre-general C-4 report, in violation of RCW 42.17A.235. **[Exhibit 1 at 33–44; Exhibit 9]**
- 1.9 On November 8, 2024, the PDC received a fifth complaint from Mr. Edwards alleging Mr. Scott and/or the Committee used an assumed name on a POLAD distributed on October 14, 2024, in violation of RCW 42.17A.320; and failed to provide campaign books of account inspection as required by RCW 42.17A.235(6) and WAC 390-16-043. **[Exhibit 1 at 70–79]**

Communications with Respondent

- 1.10 PDC Staff (Staff) communicated with Mr. Scott and sent all complaints to shaun@betterwashington.org, the email address identified on the Committee's Candidate Registration (C-1). **[Exhibit 1]**
- 1.11 On June 25, 2024, Staff notified Mr. Scott about the first complaint and requested a response to the complaint by July 9, 2024. Staff received no response, and on July 12, 2024, Staff reached out again to Mr. Scott with a deadline of July 16, 2024, to which the Committee responded on July 15, 2024. The Committee also amended implicated reports on July 15 and 17, 2024, addressing the allegations. **[Exhibit 1 at 1–2, 8]**
- 1.12 Staff notified Mr. Scott about the second complaint on July 29, 2024, with a deadline for response of August 5, 2024. After no response, Staff reached out again on August 7, 2024. **[Exhibit 1 at 8–9]**
- 1.13 On August 10, 2024, Staff notified Mr. Scott of the third complaint with a response deadline of August 12, 2024. Prior to notification about the third complaint, on August 5, 2024, Mr. Scott amended the C-4 report covering July 16 through July 29, 2024 to include the missing vendor address for Adam Tradii. On August 13, 2024, Mr. Scott responded to the complaints. On August 20, 2024, Staff followed up with Mr. Scott requesting additional information related to the first three complaints and gave a deadline of August 26, 2024. Mr. Scott did not respond to the follow-up questions, and on August 27, 2024, Staff provided notice to Mr. Scott for an Initial Hearing scheduled for September 3, 2024. Following the notice, Mr. Scott indicated he “was in the process of responding,” but no response was received. **[Exhibit 1 at 14, 21–23]**
- 1.14 An Initial Hearing was conducted by Staff on September 3, 2024, and Mr. Scott attended the hearing. At the hearing, Staff explained to Mr. Scott what remained outstanding, how he could get his reporting into compliance with PDC requirements, and PDC expectations that substantive progress would occur within 45 days. **[Exhibit 1 at 24–26]**
- 1.15 On September 10, 2024, Staff again reached out to Mr. Scott because he had not provided any further information or fully corrected the reporting record as he said he would do following the Initial Hearing. Mr. Scott responded that same day with further answers to questions asked of him earlier, but the reporting record continued to be out of compliance. **[Exhibit 1 at 26–27]**
- 1.16 On October 2, 2024, Mr. Scott communicated with Staff that his Committee was experiencing “staff turnover at the Treasurer position that will delay mandatory filing for approximately 72 hours.” Staff let Mr. Scott know that he still had a reporting requirement regardless of staff turnover and reiterated the outstanding reporting issues that remained to be corrected as well as reports that were due and outstanding. Staff received no response from Mr. Scott, and the reporting issues were not corrected, nor were the outstanding reports filed. **[Exhibit 1 at 30]**

- 1.17 On October 21, 2024, Staff became aware that Mr. Scott had brought on Jason Bennett, President of Argo Strategies, as his Treasurer. On October 28, 2024, Staff emailed Mr. Bennett outlining the remaining outstanding reporting issues that needed correction and informed him about reports due and outstanding. Mr. Bennett responded the same day, letting Staff know that he was working on gaining access to the Committee's Online Reporting of Campaign Activity (ORCA) file and that he was aiming for mid-week of the following week to get the filing up to date. **[Exhibit 1 at 31]**
- 1.18 On October 31, 2024, Staff notified Mr. Scott of a fourth complaint that was being added to the previously opened case and instructed him to submit an overdue 7-day pre-election C-4 report as soon as possible. **[Exhibit 1 at 32]**
- 1.19 As of October 31, 2024, Mr. Bennett had access to the Committee's filing record through ORCA. Staff continued to correspond with Mr. Bennett about the reporting record, and on November 13, 2024, Mr. Bennett indicated that he would be doing a full audit and aimed to have it completed by November 23, 2024. **[Exhibit 1 at 45]**
- 1.20 On November 21, 2024, Staff notified Mr. Scott of two more complaints received concerning overdue C-4 and C-3 reports and instructed Mr. Scott to respond to these new allegations by November 28, 2024. Mr. Scott did not respond to the complaint, but Mr. Bennett did leave a message with Staff that he was working on getting the campaign reporting updated. **[Exhibit 1 at 46]**
- 1.21 Also on November 21, 2024, Staff requested a meeting with Mr. Scott to discuss the non-report related allegations. On November 25, 2024, Mr. Scott indicated he would be available for a meeting on December 6, 2024. **[Exhibit 1 at 46, 81–82]** The meeting occurred, and Mr. Scott provided additional details about the non-report related allegations. A timeline for when the reporting issues would be addressed was also discussed, and Mr. Scott indicated the reporting would be up to date by December 25, 2024. **[Exhibit 2]**
- 1.22 On December 6, 2024, Staff informed Mr. Bennett of the discussion with Mr. Scott and outlined the report-related materials that were discussed with Mr. Scott. Mr. Bennett was also informed of the December 25, 2024, timeline for the reporting to be corrected and updated. **[Exhibit 1 at 83]**
- 1.23 Between December 10, 2024, and January 17, 2025, Staff sent five more messages to Mr. Scott and Mr. Bennett seeking more information to help resolve the allegations and the reporting issues. Staff did not hear anything further from Mr. Scott but did receive an email on February 24, 2025 from Mr. Bennett explaining that the entire filing for 2024 needed to be amended and that he still was not a signatory on the Committee's bank account, which was hindering his ability to get records needed for PDC reporting. **[Exhibit 1 at 84–88]**
- 1.24 On March 14, 2025, Mr. Bennett emailed Staff that he had "finished amending all of the reports for 2024 cycle . . . and everything matches to the penny." **[Exhibit 1 at 89]**

- 1.25 On March 14, 2025, Staff followed up with Mr. Bennett about the reimbursement to the campaign by Mr. Scott for campaign funds used for haircuts. Mr. Bennett responded on the same day, stating, “He has not yet reimbursed the campaign for the expenses (I think likely due to the busy nature of session) but he is aware of the need. The total now is \$756[.]” **[Exhibit 1 at 90]**
- 1.26 On April 21, 2025, Staff again followed up with both Mr. Scott and Mr. Bennett regarding the reimbursement and the final reporting of debt in the amount of \$33,498.06. Mr. Bennett followed up on April 28, 2025 inquiring if Mr. Scott had responded to the April 21, 2025 inquiry. Mr. Bennett was told by Staff that Mr. Scott had not responded. **[Exhibit 1 at 92–93]**

II. Investigative Findings

Allegation #1: Failure to Report Debt and Contributions; Reporting Incomplete or Inaccurate Information on C-3 and C-4 Reports Prior to the 2024 Primary Election; and Failure to Timely File Mandatory 21-Day, 7-Day, and Post-Primary C-4 Reports, in Violation of RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-042, and WAC 390-16-205

PDC Staff reviewed reports associated with allegations made prior to the 2024 Primary Election and found the following:

- 2.1 The Committee included processing fees when reporting contributions on multiple C-3 reports at the beginning of the campaign in March 2024. The reports were amended and the error corrected on July 17, 2024. This error in reporting on the C-3 reports impacted the first C-4 report submitted in March 2024, resulting in the appearance of more funds being received than actually were received. This created a carry-forward issue on multiple C-4 reports until corrected on February 25, 2025. **[Exhibit 9]**
- 2.2 The Committee failed to report the address for multiple vendors on its C-4 reports. Expenditures for May 10 and 18, and June 11, 2024 were amended on July 15, 2024. An expenditure for July 28, 2024 was amended on August 5, 2024. Expenditures for April 2, 5, and 16, 2024 remained unamended until February 24, 2025. **[Exhibit 9]**
- 2.3 The Committee did not timely report the quantity of printed campaign items paid for on April 10, 2024. The C-4 report was timely submitted on May 10, 2024, but then amended on February 25, 2025 to provide the quantity of printed campaign items. A second instance of this issue occurred when printed items were paid for on May 19, 2024, and the quantity was not disclosed until the report was amended on July 15, 2024. The original report was due June 10, 2024, and was submitted timely. **[Exhibit 9]**
- 2.4 On or about July 15, 2024, a POLAD was delivered to voters. Erin Schultz, with Northwest Passage Consulting, confirmed she authorized printing the POLAD, and Capitol City Press, per Invoice #158789, completed the work. Ms. Schultz stated that she authorized the work on July 12, 2024. Capitol City Press confirmed they completed printing services for the 6x11 mailer on July 15, 2024. The billing shows an invoice date of July 22, 2024, a total

of \$3,139.83, and a due date of August 21, 2024. **[Exhibit 3]** This POLAD should have been submitted on the 21-day C-4 report as an order placed by July 16, 2024, and on the 7-day C-4 report by July 30, 2024 as debt if it was not paid by July 29, 2024. The Committee did not report the order placed until February 25, 2025, and did not report any debt until March 12, 2025. **[Exhibit 9]** The debt for this specific invoice cannot be confirmed as having been paid because, per Jason Bennett, “payments paid do not necessarily correspond directly to particular invoices because it looks like the campaign paid even amounts as funds came in.” He went on to say that the invoices “don’t necessarily line up easily with the accrued expenses perfectly so some of these show partial payment applied to original expenses.” **[Exhibit 11]**

- 2.5 On or about July 17, 2024, a POLAD was delivered to voters. Ms. Schultz again confirmed she authorized printing of the POLAD, and Capitol City Press, per Invoice #158781, completed the work. Ms. Schultz stated that she authorized the work on July 13, 2024. Capitol City Press confirmed they completed printing for the letter and envelopes on July 15, 2024. The billing shows an invoice date of July 22, 2024, a total of \$2,650.54, and a due date of August 21, 2024. **[Exhibit 4]** This POLAD should have been submitted on the 21-day C-4 report as an order placed by July 16, 2024, and on the 7-day C-4 report by July 30, 2024 as debt if it was not paid by July 29, 2024. The Committee did not report the order placed until February 25, 2025, and did not report any debt until March 12, 2025. **[Exhibit 9]** The debt for this specific invoice cannot be confirmed as having been paid because, per Jason Bennett, “payments paid do not necessarily correspond directly to particular invoices because it looks like the campaign paid even amounts as funds came in.” The invoices “don’t necessarily line up easily with the accrued expenses perfectly so some of these show partial payment applied to original expenses.” **[Exhibit 11]**
- 2.6 Staff confirmed with Ms. Schultz that she authorized work on another POLAD on July 24, 2024, outlined in Invoice #158902, to be completed by Capitol City Press. Capitol City Press confirmed they completed printing services for work outlined in Invoice #158902. The work was completed on July 30, 2024, and invoiced to Northwest Passage Consulting on July 29, 2024. The billing shows a total of \$3,293.66 and a due date of August 28, 2024. **[Exhibit 5]** This POLAD should have been submitted on the 7-day C-4 report as an order placed, and on the post-primary C-4 report as debt if it was not paid by August 5, 2024. The Committee did not report the order placed until March 12, 2025, and did not report any debt until March 12, 2025. **[Exhibit 9]** The debt for this specific invoice cannot be confirmed as having been paid because, per Jason Bennett, “payments paid do not necessarily correspond directly to particular invoices because it looks like the campaign paid even amounts as funds came in.” The invoices “don’t necessarily line up easily with the accrued expenses perfectly so some of these show partial payment applied to original expenses.” **[Exhibit 11]**
- 2.7 Between the start of the campaign and the date of the second complaint, July 18, 2024, the campaign received \$48,107.36 in individual contributions.

- a. All the C-3 reports submitted for March and April 2024 were originally filed timely and amended on July 17, 2024 to correct an error in reporting processing fees. The reports were amended again on February 24, 2025 with no significant changes. The total receipts filed for these periods were \$11,693.80, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- b. The C-3 reports submitted for May 2024 included nine reports, with seven of those filed timely; one report filed five weeks late for a total of \$1,200 from Washington State Association of Justice; and one report filed 37 weeks late for a total of \$250 from Teamsters Local 117 Working Families PAC. All the May 2024 reports were amended on July 17, 2024 to correct an error in reporting processing fees. The May 2024 reports were again amended on February 25, 2025, mostly reflecting small adjustments to Small Contributions and the following substantial changes: for the period of May 15, 2024, there was an increase of \$386; for the period of May 16, 2024, a decrease of \$611; for the period of May 22, 2024, an increase of \$225; and for the period of May 29, 2024, an increase of \$1,150. The total receipts filed for this period were \$10,619.77, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- c. The C-3 report submitted for June 2024 included 13 reports, with seven of those filed timely; one report filed four weeks late for a total of \$18 from Small Contributions; one report filed 35 weeks late disclosing \$1,072 from Small Contributions and individual contributors; one report filed three weeks late disclosing \$720 from Small Contributions and individual contributors; one report filed two weeks late disclosing \$750 from individual contributors; one report filed 35 weeks late disclosing \$2,900 from NW Regional Council of SMART SSF (\$500), SEIU Healthcare 1199 NW (\$1200), and SEIU 775 Quality Care Committee (\$1200); and one report filed 34 weeks late disclosing \$720 from Small Contributions and individual contributors. All these June reports were amended on July 17, 2024, to correct an error in reporting processing fees. The June 2024 reports were again amended on February 25, 2025, mostly reflecting small adjustments to Small Contributions and the following substantive changes: for the period of June 3, 2024, a decrease of \$250; for the period of June 17, 2024, a decrease of \$364; for the period of June 22, 2024, an increase of \$720; and for the period of June 24, 2024, an increase of \$113. The report for the period of June 14, 2024, was initially filed 38 weeks late for a total of \$500 from UAW Region 5 Western States PAC. The total receipts filed for this period were \$12,150.36, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- d. There were six C-3 reports filed between July 1, 2024 and July 18, 2024, with five of the six reports filed timely. Two of the six reports were amended on July 16, 2024 due to an error in reported processing fees being corrected by the Committee. The one late filed report was filed 31 weeks late for a total of \$200 from Small Contributions and individual contributors. The five timely filed reports were again amended on February 25, 2025, mostly reflecting small adjustments to

Small Contributions and the following substantial changes: for the period of July 3, 2024, a decrease of \$960; for the period of July 3, 2024, an increase of \$1,007 from Small Contributions and individual contributors; and for the period of July 12, 2024, a decrease of \$2,330. The total receipts filed for this period were \$13,948, not including Small Contributions filed without a receipt date. **[Exhibit 9]**

- 2.8 The C-3 reports submitted for the remainder of July 2024 were originally submitted timely but then all were amended on March 13, 2025, reflecting an increase of \$7,350 from the original reports for July. The total receipts for this period were \$13,904.48, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- 2.9 In August 2024, up to the Primary Election, an original C-3 report submitted for August 5, 2024, on August 5, 2024, was submitted timely but then amended on March 13, 2025, reflecting a decrease of \$141 from the original report. The amended report was 31 weeks late. The total receipts for this period were \$6,748, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- 2.10 The mandatory 21-day C-4 report covering June 1 through July 15, 2024, due July 16, 2024, was filed timely and then amended February 25, 2025. The amended report reflected a decrease of \$979.90 for receipts received and an increase of \$500.80 for expenditures made during the reporting period. **[Exhibit 9]**
- 2.11 The mandatory 7-day C-4 report covering July 16 through July 29, 2024, due July 30, 2024, was filed one day late on July 31, 2024, and then amended August 6, 2024. The amended report did not reflect any material changes. The report was again amended on March 12, 2025, and reflected an increase of \$511.83 for receipts received and an increase of \$484.15 for expenditures made during the reporting period. **[Exhibit 9]**
- 2.12 The mandatory post-primary C-4 report covering July 30 through August 31, 2024, due September 10, 2024, was filed March 13, 2024, 26 weeks late. The report reflected \$14,896.35 for receipts received and \$31,479.43 for expenditures made during the reporting period. **[Exhibit 9]**

Allegation #2: Failure to Include Complete Sponsor Identification on Political Advertisements, in Violation of RCW 42.17A.320(1); Failure to Conform Formatting Requirements as Outlined in RCW 42.17A.320(3) and WAC 390-18-010; and Use of an Assumed Name for the Sponsor Identification on Political Advertisements

- 2.13 Staff reviewed the three POLADs provided as evidence and determined correct sponsor identification was missing from two of the POLADs, the sponsor's mailing address was missing from one of the three POLADs, and one of the three POLADs failed to conform to formatting requirements as outlined in statute. **[Exhibits 3, 4, and 6]**
- 2.14 The POLAD identified as a 6x11 (or 6x9) mailer stated, "Paid for by the Fighting 43rd." The POLAD did not include the Committee's mailing address, but rather the URL

betterwashington.org. Better Washington is not a registered entity with the PDC. The POLAD also failed to conform to formatting requirements as outlined in RCW 42.17A.320(1). **[Exhibit 3]**

- 2.15 Two POLADs, identified as “a Chopp letter” and delivered on July 17 and October 14, 2024, stated “Paid for By A Better Washington” but included the Committee’s mailing address. On August 13, 2024, Mr. Scott confirmed the use of the name “A Better Washington” was not the correct name to have used for sponsor identification and it should have been “The Fighting 43rd”. Staff confirmed on January 30, 2025 with former Representative and current Speaker of the House, Frank Chopp, that he had no part in developing or paying for the letters. **[Exhibit 4; Exhibit 6]**.

Allegation #3: Impermissible Personal Use of Campaign Funds, in Violation of RCW 42.17A.445 and WAC 390-16-238

- 2.16 On July 16, 2024, the Committee reported four expenditures made on June 9, 17, and 26, 2024, and July 12, 2024, for haircuts to “Jesus Barbershop” totaling \$333.40. **[Exhibit 9]** On August 13, 2024, in their response to the complaint, Mr. Scott stated, “Because of television, debate, and other campaign appearances that the candidate would not be subject to were they not running for office, these are reasonably construed as an allowable campaign expense until advised otherwise explicitly by the PDC.” **[Exhibit 1 at 21]** At the September 3, 2024 Initial Hearing, Mr. Scott was informed the haircuts were most likely an impermissible use of campaign funds and the expenditures would need to be reimbursed to the campaign. On December 6, 2024, PDC Staff and Mr. Scott spoke, and again, the haircuts were discussed. At this time, Mr. Scott indicated the haircut vendor should be Supreme Cutz and not Jesus Barbershop. Mr. Scott was told to amend the reports so that the information was accurate. Staff also informed Mr. Scott they would discuss the haircuts with their team to determine past practice. On December 10, 2024, Staff let Mr. Scott know the haircuts were an impermissible use of campaign funds and would need to be reimbursed to the campaign. **[Exhibit 1 at 84]**
- 2.17 On March 14, 2025, Staff confirmed with Mr. Bennett that the reporting has been updated and now reflects a total of \$756 for haircuts from Supreme Cutz. **[Exhibit 7]** As of June 16, 2025, Mr. Scott had not reimbursed the campaign.

Allegation #4: Failure to Timely File Mandatory 21-Day and 7-Day C-4 Reports; and Failure to Timely Report Contributions Received From Entities that Reported Giving Contributions to the Committee Prior to the 2024 General Election, in Violation of RCW 42.17A.235 and RCW 42.17A.240

- 2.18 Between August 6, 2024 and November 5, 2024, the Committee received \$47,250 in individual contributions.
- a. The C-3 reports submitted for August 2024 after the Primary Election included eleven reports, with six reports submitted timely but then amended on March 13,

2025. These amended reports reflected the following: for the period of August 1, 2024, an increase of \$250; for the period of August 2, 2024, a decrease of \$141; for the period of August 3, 2024, a decrease of \$250; a report submitted for the period of August 14, 2024, a decrease of \$200; a report submitted for the period August 21, 2024, for no change; and a report submitted for the period of August 29, 2024, for an increase of \$410. There were three reports for the period of August 12, 2024, submitted on March 13, 2025, 29 weeks late, reflecting \$3,300 in contributions received. A report for the period August 6, 2025, submitted March 13, 2025, 30 weeks late, reflecting \$1,044 in contributions received. A report for the period August 23, 2024, submitted on March 13, 2025, 28 weeks late, reflected \$1,112 in contributions received. The total receipts for this period were \$12,789, not including Small Contributions, filed without a receipt date. **[Exhibit 9]**

- b. The C-3 reports submitted by the Committee on September 16, 2024, reflected contributions received on September 4, 5, and 11, 2024. The reporting of contributions received on September 11, 2024 was timely, but the reporting for contributions received on September 4 and 5, 2024 should have been submitted by September 9, 2024. All three reports were amended on March 13, 2025, and reflected \$10,140 in contributions received. A C-3 report for the period of September 13, 2024, was filed on March 13, 2025, 25 weeks late, reflecting \$600 in contributions received. C-3 reports for the periods of September 17 and 18, 2024 were filed on March 13, 2025, 24 weeks late, reflecting \$4,041 in contributions received. Three C-3 reports for the periods of September 24, 26, and 27, 2024 were filed on March 13, 2025, 23 weeks late, and reflected \$7,839 in contributions received. The total receipts for this period were \$20,228.96, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- c. There were 11 C-3 reports submitted for October 2024 with only one of those reports filed timely. The report filed timely was for the period of October 25, 2024, and reflected \$0 contributions received. Reports for the periods of October 2, 7, 11, 17, 23, and 28, 2024 were filed on November 13, 2024, between one and five weeks late, and reflected \$12,812 in contributions received. Reports for the periods of October 7, 11, 17, and 28, 2024 were filed on March 13, 2025, between 18 and 21 weeks late, and reflected \$10,950 in contributions received. The total receipts for this period were \$19,124.94, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- d. The C-3 reports submitted for the remainder of November 2024, on and as of the General Election included seven reports, due December 10, 2024. Five of the reports were filed timely for \$983 in contributions received, one other report was filed timely but then amended on March 13, 2025, for \$1600 contributions received, and one report was filed on March 13, 2025, for \$0.85 in Miscellaneous Receipts. The total receipts for this period were \$2,153.85, not including Small Contributions filed without a receipt date. **[Exhibit 9]**

- 2.19 The C-3 reports submitted on and as of the 2024 General Election included eight reports, due December 10, 2024. Seven of the reports were filed timely, disclosing \$3,430 in contributions received. One report was filed on March 13, 2025, disclosing \$0.85 as a Miscellaneous Receipt, and one report was amended on March 13, 2025, disclosing a decrease of \$200 from the previously timely reported contributions. The total receipts for this period were \$3,230.85, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- 2.20 The C-3 reports submitted for December 2024 included five reports, all filed timely on January 10, 2025. The total receipts for this period were \$157.19, not including Small Contributions filed without a receipt date. **[Exhibit 9]**
- 2.21 The mandatory 21-day C-4 report covering September 1 through October 14, 2024, due October 15, 2024, was filed on March 13, 2025, 21 weeks late. The report reflected \$33,197.96 for receipts received and \$28,841.17 for expenditures made during the reporting period. **[Exhibit 9]**
- 2.22 The mandatory 7-day C-4 report covering October 15 through October 28, 2024, due October 29, 2024, was filed on March 13, 2025, 19 weeks late. The report reflected \$13,176.94 for receipts received and \$4,720.70 for expenditures made during the reporting period. **[Exhibit 9]**
- 2.23 The mandatory post-general C-4 report covering October 29 through November 30, 2024, due December 10, 2024 was filed timely on December 10, 2024, and amended on March 13, 2025. The amended report reflects a decrease of \$199.15 in receipts received and an increase of \$0.40 in expenditures made during the period. **[Exhibit 9]**
- 2.24 The end of election C-4 report covering December 1 through December 31, 2024, due January 10, 2025, was filed timely on January 10, 2025, and amended on March 13, 2025, reflecting \$0 change from the original report. **[Exhibit 9]**

Allegation #5: Failure to Provide Campaign Books of Account Inspection, in Violation of RCW 42.17A.235(6)(a) and WAC 390-16-043

- 2.25 On November 2, 2024, Conner Edwards sent an email to the Committee at shaun@betterwashington.org and organizewithshaun@gmail.com, requesting to inspect the books of the 2024 political campaign. The request was made on a Saturday, and Mr. Edwards requested to inspect the books on the coming Monday, November 4, 2024, at 8 a.m. When the Committee did not respond back to Mr. Edwards within the required 48 hours of the time and day that it was requested for the inspection, he filed a complaint with the PDC on November 8, 2024. The complaint was opened on November 21, 2024. On December 6, 2024, Staff spoke with Mr. Scott, and he indicated that he did not think he had received the email from Mr. Edwards. On December 19, 2024, Mr. Scott confirmed he reviewed his emails and stated, "I don't believe I ever received Conner Edwards'

e-mail.” The Committee did not respond to the request within 48 hours and failed to facilitate the inspection. **[Exhibit 1 at 75, 83–84]**

- 2.26 The Committee did not maintain books of account accurately reflecting all contributions and expenditures on a current basis. **[Exhibit 8]** Campaign reporting was not finalized until March 14, 2025, and included \$147,304.57 in receipts, \$141,958.47 in expenditures, and \$33,498.06 in outstanding debt. **[Exhibit 10]**

III. Scope

- 3.1 PDC Staff reviewed the following:

- Contributions and Expenditures for the 2024 Shaun Scott campaign found in the PDC database.
- Invoices, provided as evidence, between Northwest Passage Consulting and Capitol City Press.
- Political Advertisements, provided as evidence, for the 2024 Shaun Scott campaign.

- 3.2 PDC corresponded with:

- Shaun Scott, a candidate for Washington State House of Representatives from the 43rd District
- Jay Plancich, former Treasurer for the 2024 The Fighting 43rd Committee
- Jason Bennett, President of Argo Strategies, current Treasurer for the 2024 The Fighting 43rd Committee
- Former Representative, and current Speaker of the House, Frank Chopp
- Erin Schultz, campaign consultant for Northwest Passage Consulting
- Carrie Johnson, Client Services Director for Capitol City Press

Respectfully submitted this 16th day of June 2025.

/s/ Electronically Signed

Tanya Mercier

PDC Compliance Officer

List of Exhibits

- Exhibit 1:** Complaints to PDC from Conner Edwards, Katie Martin, and Carl Larson including notification by PDC Staff to The Fighting 43rd Committee, and subsequent communications between PDC Staff and the Committee regarding the allegations (93 pages)
- Exhibit 2:** Transcript for video recording of December 6, 2024 interview by PDC Staff with Shaun Scott (15 pages)
- Exhibit 3:** 6x11 POLAD Mailer, delivered July 14, 2024, and corresponding Capitol City Press Invoice #158789 (3 pages)
- Exhibit 4:** 1st “Chopp Letter”, delivered July 17, 2024, and corresponding Capitol City Press Invoice #158781 (3 pages)
- Exhibit 5:** Invoice #158902 from Capitol City Press (1 page)
- Exhibit 6:** 2nd “Chopp Letter”, delivered October 14, 2024 (1 page)
- Exhibit 7:** Confirmation from Jason Bennett about haircut expenditures (2 pages)
- Exhibit 8:** February 26, 2025, Communication from Jason Bennett and record of reports filed by period (5 pages)
- Exhibit 9:** Listing of 2024 Cash Receipts, Monetary Contributions C-3 reports, and Receipts & Expenditure Summary C-4 reports submitted (454 pages)
- Exhibit 10:** Summary of 2024 campaign contributions, expenditures, and debts (3 pages)
- Exhibit 11:** March 14, 2025, Communications from Jason Bennett (2 pages)

Applicable Statutes and Rules

RCW 42.17A.235 and .240

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.

The statutes require candidates, political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures, including in-kind contributions/expenditures, including the name and address of each person who has made one or

more contributions during the period, together with the money or in-kind value, the date of each contribution, and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with certain exceptions. In-kind contributions must include a detailed description of the contribution, including the name and address of vendors where contributed goods or services were purchased, and if applicable, the same information for subvendors used by vendors.

Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$750 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time period and must be disclosed on Monday for contributions deposited during the previous seven days.

RCW 42.17A.240(7)

Pursuant to RCW 42.17A.240(7), expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made in the aggregate of more than \$200 during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures. Purpose details should state the goods or services provided by the vendor, including the number of items purchased, identify any candidates or ballot propositions supported or opposed by the expenditure, and the name & address of any sub-vendors used. For advertising expenditures, campaigns should describe the type and number of ads, where they appeared or were broadcast, and when (e.g. run dates).

WAC 390-16-042

Pursuant to WAC 390-16-042, contingent liabilities, also known as debts and obligations, must be reported, provided that the amount of the debt or obligation owed to a vendor is more than \$1,000, and the vendor has not been paid in full for the goods received, invoices submitted, or services performed within the time periods specified below:

- (i) For reports due within 30 days of an election, debts or obligations of more than \$1,000 must be reported if the debt or obligation has been outstanding for more than five business days as of the last day of the reporting period.
- (ii) For reports due during any other reporting period, debts or obligations of more than \$1,000 must be reported if the debt or obligation has been outstanding for more than 10 business days as of the last day of the reporting period.

WAC 390-16-205

Pursuant to WAC 390-16-205, expenditures by agents and agents' subvendors must be reported as though they are expenditures made by the candidate or committee.

RCW 42.17A.235(6)(a)

Pursuant to RCW 42.17A.235(6)(a), the treasurer for a candidate or a political committee shall maintain books of account accurately reflecting all contributions and expenditures on a current basis within five business days of receipt or expenditure. During the ten calendar days immediately preceding the date of the election the books of account shall be kept current within one business day. As specified in the political committee's statement of organization filed under RCW 42.17A.205, the books of account must be open for public inspection by appointment at a place agreed upon by both the treasurer and the requestor, for inspections between 9:00 a.m. and 5:00 p.m. on any day from the tenth calendar day immediately before the election through the day immediately before the election, other than Saturday, Sunday, or a legal holiday. It is a violation of this chapter for a candidate or political committee to refuse to allow and keep an appointment for an inspection to be conducted during these authorized times and days. The appointment must be allowed at an authorized time and day for such inspections that is within forty-eight hours of the time and day that is requested for the inspection. The treasurer may provide digital access or copies of the books of account in lieu of scheduling an appointment at a designated place for inspection. If the treasurer and requestor are unable to agree on a location and the treasurer has not provided digital access to the books of account, the default location for an appointment shall be a place of public accommodation selected by the treasurer within a reasonable distance from the treasurer's office. WAC 390-16-043 further outlines requirements for the books of account inspection.

RCW 42.17A. 320 (1) & (3)

Pursuant to RCW 42.17A.320, all written political advertising shall include the name and address of the sponsor. The use of an assumed name for the sponsor shall be unlawful. Sponsor identification should appear on the first page or fold of the political advertising, in at least ten-point type, and be set apart from any other printed matter. WAC 390-18-010 indicates that all advertising must clearly state that it has been paid for by the sponsor. RCW 42.17A.320(3) sets forth the size and placement requirements for identifying the sponsor of political advertising. Subsection (a) states that the font size used in the sponsor identification statement for a written advertisement or communication directed at more than one voter must be at least the larger of the following: 1) ten-point type; or 2) ten percent of the largest type used in the advertisement.

RCW 42.17A.445

Pursuant to RCW 42.17A.445, contributions received and reported in accordance with RCW 42.17A.220 through .240 and .425 may only be paid to a candidate, or a treasurer or other individual or expended for such individual's personal use under certain outlined conditions. The most common condition allowed is for reimbursement for direct out-of-pocket election campaign and postelection campaign related expenses made by the individual. For example, expenses for childcare or other direct caregiving responsibilities may be reimbursed if they are incurred directly as a result of the candidate's campaign activities. To receive reimbursement from the political committee, the individual shall provide the political committee with written documentation as to the amount, date, and description of each expense, and the political

committee shall include a copy of such information when its expenditure for such reimbursement is reported pursuant to RCW 42.17A.240. WAC 390-16-238 further outlines restrictions and requirements for the personal use of contributions.