



**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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

August 23, 2024

Delivered electronically to WSVMA-PAC sponsored by Washington State Veterinary Medical Association at [sherrid@wsvma.org](mailto:sherrid@wsvma.org) and [info@wsvma.org](mailto:info@wsvma.org)

Subject: Complaint filed by Conner Edwards, PDC Case 156267

Dear Ken Gordon and Sherri Dean:

Below is a copy of an electronic letter sent to Connor 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 .240 for failure to timely and accurately file Cash Receipts, Monetary Contributions (C-3) and Receipts & Expenditure Summary (C-4) reports. Staff expects the committee, moving forward, to follow all statutes and rules about filing accurate and timely campaign reports. 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](mailto: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 23, 2024

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

Subject: Complaint against WSVMA-PAC sponsored by Washington State  
Veterinary Medical Association, PDC Case 156267

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on June 29, 2024. The complaint alleged that WSVMA-PAC sponsored by Washington State Veterinary Medical Association, a political committee, may have violated RCW 42.17A.235 and .240 by failing to file timely and accurate Cash Receipts, Monetary Contributions (C-3) and Receipts & Expenditure Summary (C-4) reports in the 2024 election.

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 Respondent filed a Political Committee Registration (C-1pc) with the PDC on November 10, 2023, as a Continuing Committee for the Full Reporting option.
- Upon review of the campaign reporting for 2024, PDC staff found the following:
  - C-3 110202562, for a 1/31/24 deposit totaling \$1,116, was filed 14 days late, and C-4 110202563 for the period 01/01/24-01/31/24, reporting no expenditures, was also filed 14 days late.
  - C-3 110228143, for a deposit on 02/29/24, was filed four months late and reflected small contributions totaling \$1,700.
  - C-3 110210182, for a deposit on 03/31/24 totaling \$565, was filed two days late, and C-4 110210183 for the period 03/01/24-03/31/24, reporting no expenditures, was also filed two days late.

- C-3 110223620, for a deposit on 04/30/24 totaling \$1,667, was filed one month late, and C-4 110223621 for the period 04/01/24-04/30/24, reporting \$10,800 in expenditures to campaigns in the 2024 election, was also filed one month late.
  - C-3 110223622, for a deposit on 05/31/24 totaling \$583, was filed eight days late, and C-4 110223623 for the period 05/01/24-05/31/24, reporting no expenditures, was also filed eight days late.
  - C-3 110238276, for a deposit on 06/30/24 totaling \$700, was filed over two months late.
  - The committee did not file a 21-day report, but rather filed a monthly C-4, #110228144. The report was filed on 07/10/24, and amended on 08/13/24, for period 06/01/24 – 06/30/24. The report (both initially and as amended) showed \$12,600 in expenditures to campaigns in the 2024 election. The initial report omitted a \$700 deposit on 6/30/24, which was reflected in the amended report. As a monthly report, the initial C-4 was filed timely, but no report was filed specifically for the required 21-day preelection period. Ultimately, the relevant activity was covered by the monthly reports filed in on July 10 and August 13, although the public did not have the benefit of the specific reporting periods required by law.
  - The committee did not file a 7-day report, but rather filed a monthly C-4, #110238283. The report was filed on 08/13/24, for period 07/01/24-07/31/24. The report showed no expenditures. The report would have been one day late as a monthly report, but as a report covering the 7-day preelection reporting period, it was several days later than that.
  - The committee did not file a required post-primary report, but rather filed a monthly C-4, #110244049, for the month of August. The report showed no expenditures.
  - C-3 110238282, for a deposit on 07/31/24 totaling \$750, was filed eight days late.
- 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 file timely and accurate Cash Receipts, Monetary Contributions (C-3) and Receipts & Expenditure Summary (C-4) reports in the 2024 election does not amount a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, WSVMA-PAC sponsored by Washington State Veterinary Medical Association will receive a formal written warning concerning the requirement under RCW 42.17A.235 and .240 for failure to timely and accurately file Cash Receipts, Monetary Contributions (C-3) and Receipts &

Expenditure Summary (C-4) reports. Staff expects the committee, moving forward, to follow all statutes and rules about filing accurate and timely campaign reports. 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@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: Ken Gordon and Sherri Dean