



**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.pdcc.wa.gov

October 8, 2024

Delivered electronically to Southwest Washington Firefighters PAC at
tony.lothspeich@iaff452.org

Subject: Complaint filed by Conner Edwards, PDC Case 156305

Dear Tony Lothspeich:

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 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. Staff expects you to timely and accurately file all required reports of contributions and expenditures going forward. 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 per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier, Compliance Officer, by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically Signed
Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed
Peter Frey Lavalley
Executive Director



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October 8, 2024

Delivered electronically to Conner Edwards

Subject: Complaint about Southwest Washington Firefighters PAC, PDC Case 156305

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 29, 2024. The complaint alleged that the Southwest Washington Firefighters PAC, a committee, may have violated RCW 42.17A.235 and .240 for failure 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 campaign.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response(s) provided by the Southwest Washington Firefighters PAC (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

Per RCW 42.17A.235 and .240, under the Full Reporting option, a committee is required to disclose contribution and expenditure information by submitting Receipts and Expenditure Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3) reports to the PDC. The Committee’s due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.

- RCW 42.17A.235(3)(a) indicates a C-4 report is due each month if the committee has received a contribution or made an expenditure in the preceding calendar month and either the total contributions received, or the total expenditures made since the last such report exceed the thresholds outlined in RCW 42.17A.235.
 - Prior to 2023 the threshold for required reporting, showing contributions or expenditures was \$200, and in 2023 the threshold was raised to \$750.

Background & Findings

Staff found the following:

- The Respondent filed a Political Committee Registration (C-1pc), for the Full Reporting option, on January 1, 2021, as a continuing committee.
- The reporting record of the Respondent, as well as the materials provided by you in your complaint, show no evidence the Respondent took part in the 2020, 2022, 2023 or 2024 elections.
- The Respondent's filing record for 2020 shows that all C-3s were filed timely. The C-4 filed for the entire calendar year was filed one month late. Total contributions raised were \$2,168 and there were no expenditures.
- PDC staff notified the Respondent about the complaint on July 11, 2024. The Respondent acted between July 14 and July 16, 2024, to correct the alleged incorrect carry forward at the start of the 2021 calendar year. The reporting record shows the Respondent did take part in the 2021 election.
 - C-4 #110009927, for the period January 1, 2021, to January 31, 2021, was originally submitted on September 1, 2021, showing no contributions or expenditures. The carryforward was amended on July 16, 2024.
 - The C-3s filed between February 2021 and May 2021 were filed timely. The June and July 2021 C-3s were each filed a month late. August, September, October, November, and December 2021 C-3s were filed timely.
 - The C-4s for February 2021 through July 2021 were all filed late on September 1, 2021. The August C-4 was filed timely. The September C-4 was filed one month late. The October, November, and December C-4s were filed timely.
 - Total contributions raised were \$11,156.50 and expenditures were \$3,281.02. Reported contribution activity was from payroll deductions made by the Respondent's members.
- The Respondent's filing record for 2022 shows all but one of the C-3s were filed late as was the case with the C-4s. Most impactful, the first C-4 in 2022, #110077459 originally filed on March 20, 2022, was amended on July 16, 2024, to reflect a change to the carryforward. Total contributions raised were \$11,124 and there were no expenditures. The reported contribution activity was from payroll deductions made by the Respondent's members.
- In 2023 all the C-3s and the C-4s were filed late on January 26, 2024. The total contributions raised were \$11,377 and there were no expenditures. The reported contribution activity was from payroll deductions made by the Respondent's members.
- Staff found that between January and June 2024, the Respondent met the contribution threshold each month and therefore had a requirement to file the following reports, which were submitted as follows:
 - The January C-3 was filed timely, and the C-4 was originally filed timely but then amended on July 16, 2024, to revise the carryforward for the start of the calendar year.

- February's C-3 was filed 3 months late, and the C-4 was 4 months late.
 - The March C-3 and C-4 were filed 3 months late.
 - April's C-3 was filed 1 month late, and the C-4 was 2 months late.
 - The May C-3 and C-4 were filed 1 month late.
 - June's C-3 was timely, and the C-4 was filed 1 month late.
 - Total contributions raised were \$6,873 and there were no expenditures. The reported contribution activity was from payroll deductions made by the Respondent's members.
- The Respondent does not have previous similar warnings or violations of PDC requirements.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, failure to timely and accurately file *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) does not amount to a finding of a violation that warrants further investigation.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, Southwest Washington Firefighters PAC will receive a formal written warning concerning their failure to comply with the filing requirements noted above. The formal written warning will include staff's expectation that they timely and accurately file all required reports of contributions and expenditures going forward. 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 Tanya Mercier, Compliance Officer by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed
Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed
Peter Frey Lavalley
Executive Director

cc: Southwest Washington Firefighters PAC