



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

October 2, 2024

Sent electronically to William Boyd at [bboyd@spokaneinsurance.net](mailto:bboyd@spokaneinsurance.net)

Subject: Complaints filed by Conner Edwards, PDC Case 156423

Dear William Boyd:

Below is a copy of an electronic letter sent to Conner Edwards concerning the complaints filed with the Public Disclosure Commission (PDC) on June 11, July 19, August 1, and September 13, 2024.

As noted below 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 this allegation or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this letter constitutes a formal written warning concerning your failure to file timely and accurate contribution (C-3) and expenditure (C-4) reports, as required by law. PDC staff expects that you will file timely and accurate (C-3) and (C-4) reports in the future. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Accordingly, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Erick O. Agina, Compliance Officer

s/\_\_\_\_\_  
Peter Frey Lavalley, Executive Director





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October 2, 2024

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

Subject: Complaints regarding William Boyd, PDC Case 156423

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 11, 2024, including the three supplemental complaints you filed on July 19, August 1, and September 13, 2024, respectively. Your complaints alleged that William Boyd, a 2024 candidate for the office of the Insurance Commissioner, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file contribution and expenditure reports, as required by law.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegation(s) in the complaint; the applicable statute(s), rule(s), and reporting requirements; the Cash Receipts Monetary Contributions (C-3) and Summary, Full Report Receipts and Expenditures (C-4) reports filed by William Boyd (Campaign); the July 24, 2024, response to the complaint submitted by William Boyd on behalf of the Campaign; 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:

- On November 6, 2023, William Boyd filed a Candidate Registration (C-1) and selected the Full Reporting Option. Mr. Boyd listed John Ott as the Treasurer.
- Staff noted that the Campaign failed to timely and accurately file C-4 reports. As a candidate registered with the PDC under the "Full Reporting" option, William Boyd's Campaign was required to file timely and accurate monthly C-4 reports beginning January 10 – June 10, 2024, for expenditures made in the previous month(s), including the pre-primary 21- and 7-day, and the post-primary C-4 reports for a candidate who appeared in the 2024 primary election cycle. For example, the Campaign failed to timely and accurately file the May 2024 C-4 report. The May C-4 report was due no later than June 10, 2024, and was filed 51 days late on July 31, 2024, showing expenditures for "Filing fees" in the amount of \$1,457.14 paid on May 6, 2024, and two expenditures for \$1,250 each, paid to *Ellis Media* on May 29 and June 6, 2024, for "Management and Consulting Services."

- The Campaign also failed to timely and accurately file the pre-primary 21- and 7-day C-4 reports. The reports were due no later than July 16 and July 30, 2024, respectively, and were filed 15 days and 1 day late, respectively on July 31, 2024.
- Staff also noted that the Campaign failed to timely file some contributions (C-3) reports, as required by the statutory scheme. As a candidate appearing in the 2024 election cycle, William Boyd's Campaign was also required to file timely monthly C-3 reports for deposits made in the previous month(s), beginning January 10 through May 10, 2024, and file weekly C-3 reports, each Monday, for deposits made during the previous 7 days beginning June 3, 2024.
- On May 1, 2024, and July 5, 2024, William Boyd deposited \$2,800 and \$1,250 of his personal funds in his Campaign bank account but did not file C-3 reports for the deposits until August 27, 2024. The Campaign should have reported the May 1, 2024, deposit on a monthly C-3 report in June 2024. For the second deposit on July 5, 2024, the Campaign was required to file weekly C-3 report. This specific deposit should have been reported no later than July 8, 2024, and was filed 50 days late on August 27, 2024.

Based on these findings, staff has determined that, in this instance, the Campaign's failure to timely and accurately file the statutory C-3 and C-4 reports, does not amount to a violation warranting further investigation. The Campaign acknowledged the violations and took responsibility by filing the missing reports.

However, pursuant to WAC 390-37-060(1)(d), William Boyd will receive a formal written warning concerning his failure to timely and accurately file contribution and expenditure reports, as required by law. William Boyd will be informed the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Accordingly, 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 Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Erick O. Agina, Compliance Officer

s/\_\_\_\_\_  
Peter Frey Lavalley, Executive Director

cc: William Boyd