



**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)**

October 28, 2024

Delivered electronically to [sectreas726@iaff726.org](mailto:sectreas726@iaff726.org)

Subject: Complaint filed by Conner Edwards, PDC Case 157524

Dear Citizens for Better Government by IAFF Local 726:

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 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 these allegations or take further enforcement action in this matter.

Citizens for Better Government by IAFF Local 726 completed a *Statement of Understanding* (SOU) and paid a \$150 civil penalty on October 22, 2024 in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely file three C-4 reports disclosing a total of \$34,726 in election-related expenditures for election year 2024. The \$150 penalty assessed resolves the late C-4 reports.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), this also serves as a formal written warning concerning your failure to timely file one C-3 report and a post-Primary C-4 report, as noted in the enclosed letter sent to Mr. Edwards. Staff expect you to timely file all required reports of deposits, contributions and expenditures in the future. 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 in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Electronically signed Tabatha Blacksmith  
Tabatha Blacksmith  
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavallee  
Peter Frey Lavallee  
Executive Director



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October 28, 2024

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

Subject: Complaint regarding Citizens for Better Government by IAFF Local 726, PDC Case 157524

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 24, 2024. The complaint alleged that Citizens for Better Government by IAFF Local 726 Sponsored by IAFF Local 726, a continuing committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately file a *Campaign Summary Receipts & Expenditures* reports (C-4 report) disclosing contributions and expenditures undertaken by the campaign in April of 2024.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response provided by Citizens for Better Government by IAFF Local 726 (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

- [RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and 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 committee’s election participation, and their financial activity.
- Pursuant to RCW 42.17A.235(3)(a), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750<sup>1</sup>.

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<sup>1</sup> Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

## Background & Findings

Based on staff's review, we found the following:

- The Respondent first registered with the PDC as a political committee in 2008, and most recently amended their *Committee Registration* (C-1pc) on February 15, 2023. The committee selected the Full Reporting option.
- The Respondent's filing history shows the following information was reported late:
  - A C-4 report covering 4/2/24 – 4/15/24 activity was filed 75 days late and before the Primary Election. The report disclosed \$7,700 in election-related expenditures, including seven contributions made to candidates ([report 110232260](#)).
  - A monthly C-4 report for May, 2024 was filed 44 days late and before the Primary Election. The report disclosed \$6,000 in election-related expenditures, including five contributions made to candidates ([report 110232266](#)).
  - The committee's 21-day pre-Primary C-4 report (covering 6/1/24 – 7/15/24) was filed eight (8) days late but mitigated by a lack of contribution and expenditure activity.
  - The committee's 7-day pre-Primary C-4 report (covering 7/16/24 – 7/29/24) was filed one (1) day late and before the Primary Election. Late-reported expenditures totaled \$21,026, including \$5,300 in election-related expenditures (six contributions made to candidates), and a \$15,726 contribution made to a political committee ([report 110234641](#)).
  - The committee's Post-Primary C-4 report (covering 7/30/24 – 8/31/24) was filed three (3) days late but is mitigated by a lack of contribution or expenditure activity.
  - Four C-4 reports covering 1/1/24-4/1/24 and one C-4 report covering 4/16/24-4/30/24 appeared to be late but were not required due to a lack of contribution and expenditure activity, which placed them below the \$750 threshold that triggers a monthly reporting requirement per RCW 42.17A.235(3)(a).
  - One C-3 report for 7/25/24 was filed two (2) days late.
- On August 5, 2024, the committee responded to the complaint in writing and indicated their reports were inadvertently filed late due to "an internal calendaring/administrative issue," which has since been addressed. The Respondent said they have put internal controls in place to prevent this issue from recurring in the future.
- The Respondent was responsive to the PDC's notice of the complaint and filed their late 7-day pre-Primary C-4 report within 24 hours of being notified.
- The Respondent timely filed their 21-day pre-General C-4 report for election year 2024.

- The Respondent does not have previous warnings/violations of PDC requirements<sup>2</sup>.

### Summary and Resolution

Mitigating factors in this case include the following:

- The late C-4 reports disclosing election-related expenditures, including one pre-Primary C-4 report, were filed before the Primary Election and therefore did not deprive the public of information during a time-sensitive period in the campaign.
- The two late pre- and post-Primary C-4 reports were mitigated by a lack of contribution or expenditure activity.
- The Respondent 1) quickly took corrective action to file a missing pre-election report within 24 hours; 2) was cooperative throughout the process; and 3) and acknowledged and took responsibility for the alleged violations.

Citizens for Better Government by IAFF Local 726 completed a *Statement of Understanding* (SOU) and paid a \$150 civil penalty on October 22, 2024 in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely file three C-4 reports disclosing a total of \$34,726 in election-related expenditures for election year 2024. The \$150 penalty assessed resolves the late C-4 reports.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), Citizens for Better Government by IAFF Local 726 will also receive a formal written warning concerning their failure to timely file one C-3 report and a post-Primary C-4 report for election year 2024. The formal written warning will include staff's expectation that Citizens for Better Government IAFF Local 726 timely file all future required reports of deposits, contributions and expenditures. 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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Electronically signed Tabatha Blacksmith  
Tabatha Blacksmith  
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley  
Peter Frey Lavalley  
Executive Director

cc: Citizens for Better Government by IAFF Local 726

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<sup>2</sup> The subject of prior PDC Case 13-030 was a committee named Citizens for Better Government located in Clarkston, WA (Asotin County) that appears to be defunct. The Respondent in this case (157524), which is in Pierce County, does not appear to be the same committee.