

<b>Respondent Names</b>
FRIENDS OF COMMUNITY AND TECHNICAL COLLEGES
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<p><u><a href="#">Conner Edwards</a></u> reported via the portal</p> <p><b>Description of Complaint</b></p> <p>See the C4 covering Jan 2023 filed by this committee: <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110226986">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110226986</a>. Considering the amount of activity disclosed by this committee for January 2023, the deposit described on the following C3 should have been filed no later than 2/10/23. Instead, it was not filed until 7/6/23. See link: <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110226985">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110226985</a></p> <p>Additionally, the committee failed to disclose the number of "Thank You" cards purchased by the committee in 2020 as well as the underlying vendor name from whom the cards were purchased (I understand that PDC staff believe this is required by state law). See link: <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110226913">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110226913</a></p> <p>By any objective measure, it is unacceptable that the PDC would take no action to help bring this filer into compliance now that the statute of limitations is rapidly approaching. The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of committees and enforce filing requirements damages both the public and the committees themselves.</p> <p>I have tried many different times to get the PDC to take action on this type of issue with no tangible results whatsoever. At one point, I believe the agency discussed the possibility of internally flagging non-filers in the PDC's system and proactively reaching out to them to bring them into compliance, but it appears this is not happening.</p> <p>Having exhausted all of my other options to pursue reform, the only remaining option available to me to compel the agency to take action here is to file PDC complaints against these noncompliant filers in an effort to force the agency to take action.</p> <p>By highlighting the agency's failure to meaningfully enforce current reporting deadlines, my hope is that the agency will look to improve its own enforcement procedures and help committees and treasurers comply with the law.</p> <p><b>Notice to Respondents:</b></p> <p>I apologize to you for any inconvenience caused by this complaint; it is not my intention.</p>

No campaign treasurer or campaign/committee is perfect. Trying to comply with the myriad of requirements and deadlines the PDC enforces can be extremely difficult, even for those who have been doing this for years. The agency could adopt any number of strategies to help filers "get it right" when it comes to deadlines and other requirements. Some of these strategies might include: a) automated electronic filing reminders to a filer when they have missed a deadline, b) mandatory attendance in a PDC training course before a person is allowed to serve as treasurer, c) giving filers 48 hours to file 21- & 7-day pre-election reports as opposed to the 24 hours candidates currently get, and d) improvements to the ORCA online campaign finance filing system to improve useability.

In my opinion, the agency has failed to provide many filers with the knowledge and tools that they need to file reports on time and be compliant.

If you are confused by the filing requirements that the agency enforces or are experiencing technical difficulties and/or usability issues with the ORCA system, please be sure to indicate this in your response to the PDC: your comments will provide valuable feedback for the agency.

#### **What impact does the alleged violation(s) have on the public?**

Because this committee has not timely filed one or more required reports, members of the public are unable to view up to date financial information, significantly reducing transparency available to voters.

The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of committees and enforce filing requirements damages both the public and the candidates themselves.

It is imperative that PDC staff reach out to this committee immediately to bring them into compliance.

#### **List of attached evidence or contact information where evidence may be found**

PDC website.

#### **List of potential witnesses with contact information to reach them**

See respondent contact info on PDC website.

#### **Certification (Complainant)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.