



**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

November 22, 2024

Delivered electronically to Local 48 Electricians PAC at busmgr@ibew48.com

Subject: Complaint filed by Conner Edwards, PDC Case 158465

Dear Garth Bachman:

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\(1\)](#).

You completed a Statement of Understanding (SOU) and paid a \$750 civil penalty in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule), acknowledging a violation RCW 42.17A.250 by failing to timely and accurately report as an out-of-state political committee during years 2019, 2020, 2021, 2022, 2023, and 2024. The \$750 penalty assessed resolves the allegations listed in the complaint.

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



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November 22, 2024

Delivered electronically to Conner Edwards at cg.edwards53@gmail.com

Subject: Complaint regarding Local 48 Electricians PAC, PDC Case 158465

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 14, 2024. The complaint alleged that the Local 48 Electricians PAC, a political committee, may have violated RCW 42.17A.250 by failing to timely and accurately report as an out-of-state political committee in 2024.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response(s) provided by the Local 48 Electricians 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

Under RCW 42.17A.250(2), an out-of-state political committee is required to file an Out-Of-State Political Committee (C-5) Report “no later than the tenth day of the month following any month in which a contribution or other expenditure reportable under subsection (1) of this section is made. An out-of-state committee incurring an obligation to file additional statements in a calendar year may satisfy the obligation by timely filing reports that supplement previously filed information.”

Background & Findings

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

- The Local 48 Electricians Political Action Committee (PAC) is a political action committee of the International Brotherhood of Electrical Workers, Local 48 union, based in Portland, Oregon.
- Local 48 Electricians PAC receives contributions from Washington residents. The PAC expends those funds by being the primary contributor to the Southwest WA Electricians PAC 48 of WA, a Washington state registered political action committee. The Southwest WA Electricians PAC participates in Washington elections by contributing to candidates and other committees. These

two PACs share the same stated purpose of supporting candidates and measures advocating family, living wages, benefits and working conditions.

- On September 25, 2024, the Local 48 Electricians PAC filed three Out-of-State Political Committee (C-5) reports with the Washington State Public Disclosure Commission (PDC) for 2024. The reports were amended on October 3rd, 4th and 7th in 2024 and included expenditures to Southwest WA Electricians PAC 48 of WA for a total of \$110,839.02 between February and September 2024.
 - These reports also showed a total of \$251,278.77 reported as contributions received from Washington state residents.
 - The September report was timely, but the reports covering earlier periods in the year were untimely.
- On September 25, 2024, the Local 48 Electricians PAC filed four C-5 reports with the PDC for 2023. The reports were amended on October 10, 2024, and included expenditures to Southwest WA Electricians PAC 48 of WA for a total of \$71,116.99 between January and September 2023.
 - These reports also showed a total of \$194,193.90 reported as contributions received from Washington state residents.
 - All the reports were filed late.
- On October 18, 2024, the Local 48 Electricians PAC filed the following C-5 reports with the PDC:
 - Four C-5 reports were filed for 2022. The reports showed expenditures to Southwest WA Electricians PAC 48 of WA for: \$21,701.61 on February 11, 2022; \$32,368.75 on June 1, 2022; \$36,943.95 on September 1, 2022; and \$38,335.22 on November 17, 2022.
 - All the reports were filed late.
- On October 29, 2024, the Local 48 Electricians PAC filed the following C-5 reports with the PDC:
 - Eight C-5 reports were filed for 2021 and are late filed. The reports showed expenditures to Southwest WA Electricians PAC 48 of WA for: \$22,425.09 on January 25, 2021; \$11,998 on February 22, 2021; \$9,936.36 on March 30, 2021; \$21,058.22 on May 17, 2021; \$23,419.74 on July 30, 2021; \$10,610.03 on September 8, 2021; \$11,609.93 on October 15, 2021; and \$36,116.28 on December 8, 2021.
 - Six C-5 reports were filed for 2020 and are late filed. The reports showed expenditures to Southwest WA Electricians PAC 48 of WA for: \$32,008.32 on January 6, 2020; \$20,678.12 on March 2, 2020; \$10,308.66 on April 16, 2020; \$21,475.84 on June 10, 2020; \$20,466.20 on August 28, 2020; and \$30,439.61 on November 10, 2020.
 - Nine C-5 reports were filed for 2019 and are late filed. The reports identified expenditures to Southwest WA Electricians PAC 48 of WA for: \$10,402.15 on January 22, 2019; \$10,562.58 on February 21, 2019; \$9,443.32 on March 14, 2019; \$9,890.63 on April 11, 2019; \$11,739.11 on May 7, 2019; \$10,217.72 on June 26, 2019; \$50,000 on July 3, 2019; \$32,124.85 on September 6, 2019; and \$11,828.06 on October 14, 2019.
- The Respondent does not have previous warnings or violations of similar PDC requirements.

Summary and Resolution

The Local 48 Electricians PAC completed a Statement of Understanding (SOU) and paid a \$750 civil penalty in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule), acknowledging a violation of RCW 42.17A.250 for failing to timely and accurately report as an out-of-state political committee in years 2019, 2020, 2021, 2022, 2023, and 2024. The \$750 penalty assessed resolves the allegations listed in your complaint.

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@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director

cc: Local 48 Electricians PAC