



**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

December 13, 2024

Delivered electronically to brandon.franck@hotmail.com

Subject: Complaint filed by Conner Edwards, PDC Case 159065

Dear Southwest Washington Firefighters PAC

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\(1\)](#).

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).

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning the requirement to timely and accurately file Campaign Summary Receipts and Expenditures (C-4) reports. In the future, staff expects you to file timely and accurately as required. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Colin Peeples at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Colin Peeples
Colin Peeples
Compliance Coordinator

Endorsed by,

Electronically signed Peter Frey Lavallee
Peter Frey Lavallee
Executive Director



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December 13, 2024

Delivered electronically to cg.edwards53@gmail.com

Subject: Complaint regarding Southwest Washington Firefighters PAC, PDC Case 159065

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 27, 2024, and August 20, 2024. The complaint alleged that Southwest Washington Firefighters PAC, a political actions 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 Southwest Washington Firefighters PAC (the "Respondent"); the applicable PDC reports filed by the Respondent; the Respondent's data in the PDC contribution and expenditure database; 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

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

- Southwest Washington Firefighters PAC reported activity exceeding \$750 and did not file C-4 reports in accordance with the filing schedule as required by RCW 42.17A.235.
- The complaint alleged activity exceeding \$750 in the aggregate, triggering required C-4 (expenditure) Reports.
- The Respondent indicated that they filed C-6 (Independent Expenditures) Reports in lieu of C-4 (expenditure) Reports, and believed they complied with their filing requirements. Once notified of the complaint, the Respondent amended reports.
- The Respondent has a previous warning for late reporting, but did not have the benefit of the warning when they made the late filings.

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\(1\)](#).

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, Southwest Washington Firefighters PAC will receive a formal written warning concerning failure to timely disclosure of all contribution and expenditures. The formal written warning will include staff's expectation that Southwest Washington Firefighters PAC timely files all future required reports of 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.

If you have questions, you may contact Colin Peeples at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed Colin Peeples
Colin Peeples
Compliance Coordinator

Endorsed by,

Electronically signed Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Southwest Washington Firefighters PAC