

[Conner Edwards](#) replied

Tue, 25 Feb 2025

To:"PDC Support" <pdcc@pdcc.wa.gov>

Cc:matthew@wsrp.org, joel@ard.law

External Email

Hi Jennifer:

Thanks for the opportunity to respond to these new allegations being added by staff as part of PDC Case No. 159267.

Allegation 3: Violation of RCW 42.17A.235 & .240 for failure to timely and accurately file contribution reports

Allegation 4: Violation of RCW 42.17A.220 for failure to timely deposit funds.

The WSRP takes these allegations seriously and will institute new internal processes to make sure that these violations do not reoccur. The WSRP supports campaign finance disclosure.

However, owing to the unique circumstances of this case, we are requesting that staff dismiss these allegations pursuant to WAC 390-37-061 because these violations had minimal impact on the public and were the result of good-faith human error. The following factors described in WAC 390-37-061(4) weigh in favor of dismissal of PDC staff's new allegations.

The impact of the noncompliance on the public was minimal.

The noncompliance alleged with respect to allegations 3 & 4 had no discernable impact on the public. Regardless of whether the contribution was deposited within 5 business days of receipt and regardless of whether the initial report contained a slightly different date of receipt is of little consequence because of the timing of relevant deadlines.

The contribution at issue here was required to have been disclosed by the May 10, 2024 deadline. And, in fact, the contribution was filed one day before this deadline and was thus timely disclosed to the public.

The noncompliance resulted from a good-faith error, omission, or misunderstanding.

The violation relating to allegation 3 was the result of human error with respect to the internal handling of the contribution that caused: a) the contribution to be deposited slightly after the required 5 business day period, and b) that initially caused an incorrect receipt date to be reported relating to the contribution at issue.

The WSRP's treasurer is a first-time filer who, despite good faith efforts at compliance, has not yet gained a complete mastery of our state's often complicated campaign finance laws.

There is no evidence that any person, including an entity or organization, benefited politically or economically from the noncompliance.

There is no indication that the WSRP benefitted in any way relating to these new allegations.

The respondent quickly took corrective action or initiated other remedial measures prior to any complaint, or when noncompliance was brought to respondent's attention (e.g., filing missing reports, amending incomplete or inaccurate reports, returning prohibited or over limit contributions).

The WSRP's treasurer amended the report at issue when prompted by PDC staff.

Conclusion

For the above reasons, we are requesting that PDC staff dismiss allegations 3 & 4 pursuant to WAC 390-37-061.

Sincerely,

Conner Edwards

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